



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

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Docket No. FHWA-2021-0022

BlueGreen Alliance Response to the US Federal Highway Administration Request for Guidance on Electric Vehicle Charging Infrastructure Deployment

To Whom It May Concern:

Thank you for the opportunity to provide comment on the deployment of federal funds to support a robust, nationwide electric vehicle charging network. I write on behalf of BlueGreen Alliance, a coalition of labor and environmental organizations working to solve today's environmental challenges in ways that create and maintain quality jobs and build a clean, thriving, and equitable economy.

Our comments are primarily concerned with two factors which we hope the Secretary will strongly consider in the administration of the National Electric Vehicle Formula Program (EV Charging Program) and the discretionary Charging and Fueling Infrastructure Program:

- 1) The potential of both programs to incentivize and support the development of a robust domestic supply chain and skilled workforce for electric vehicle supply equipment (EVSE) installations, and
- 2) The effective and responsible use of coherent public/community engagement strategies in order to maximize utility and improve outcomes of program-funded EVSE investments for the people impacted by them.

Building a Robust Domestic Supply Chain & Skilled Workforce for Electric Vehicle Supply Equipment Installation

Response to Consideration #7: Fostering enhanced, coordinated public-private or private investment in EV charging infrastructure.

The allocation of federal funds toward domestically-manufactured EV charging equipment is one critical pathway by which the U.S. Department of Transportation (DOT) can support the transition to electric vehicles for drivers able to purchase them, while funneling immediate

employment and economic benefits to workers and communities where the vehicles and supply equipment are made.

A robust domestic EVSE supply chain is a goal worth pursuing. Modeling from the Economic Policy Institute finds that over 220,000 auto manufacturing jobs stand to be maintained or created with a cohesive set of policies that works to onshore the EV supply chain and grow the share of American-made EVs in the US vehicle market.¹ The same is true of the nascent EVSE supply chain. Through strict adherence to FHWA Buy America requirements, DOT and DOE have the opportunity to ensure not only that EVSE is deployed and distributed effectively and equitably, but also that workers and communities here capture the employment and economic benefits of these investments. These employment benefits include highly skilled jobs making batteries and battery components, wiring, inverters, thermal management systems, and the steel enclosures that house the internal technology.² Through enforcement of FHWA Buy America requirements, DOT and DOE can contribute to establishing and securing those jobs here in the U.S., and creating lasting economic security in manufacturing communities across America. Moreover, as the Build America, Buy America Act in the Bipartisan Infrastructure Law (BIL)—also known as the Infrastructure Investment and Jobs Act (IIJA)—comes into effect and strengthens the Buy America requirements associated with FHWA investments, this positive employment effect will be further magnified.

The development of a domestic EVSE supply chain is already in the works, due in part to the Biden administration’s commitment to Buy America provisions. There are at least three EVSE manufacturers here in the U.S. that claim to meet FHWA Buy America requirements: JuiceBar (headquartered in Norwalk, CT), Blink Charging (headquartered in Miami, FL), and FreeWire (headquartered in Newark, CA).^{3,4,5} These manufacturers provide a proof of concept: through strong “push” incentives like adherence to the FHWA Buy America requirements and substantial federal investment in the manufacturing sector, a robust, efficient, domestic supply chain is possible. The connection between policy incentives like Buy America requirements and the development of the domestic supply chain was recently made explicit by Blink Charging CEO Michael Farkas, who stated that his company’s decision to build Buy America-compliant EVSE is rooted in the administration’s advocacy for domestic manufacturing investment and Buy America compliance for EV charging equipment.

However workers for these three EVSE manufacturers will not be the only ones to benefit from adherence to Buy America requirements for federally supported EVSE investment. BlueGreen Alliance research finds that there are currently approximately 40 domestic facilities contributing to the manufacture of all levels of EV chargers, and employing nearly 3,500 workers. From these facilities, 29 are EVSE assembly facilities that make EV chargers, but may not currently be FHWA Buy America compliant—though they may follow the example of Blink Charging and others to bring their products into compliance with FHWA Buy America requirements. The remaining facilities are suppliers, manufacturing the subcomponents that comprise EV chargers. These facilities particularly stand to benefit and grow from strict

adherence to Buy America requirements for EVSE, as assemblers seek domestic component suppliers to comply with FHWA Buy America requirements.

Domestic EVSE Supply Chain Facilities as of 2017 ⁶

Manufacturer	Facility Location
ABB Group	New Berlin, WI
ABB Industrial Connections & Solutions	Mebane, NC
Advanced Control Systems	Norcross, GA
Aker Wade Power Technologies	Charlottesville, VA
Black & Veatch	Ann Arbor, MI
BTC Power	Santa Ana, CA
Cableform	Troy, VA
ChargePoint	Campbell, CA
Clean Fuel Connection	Arcadia, CA
Clipper Creek	Auburn, CA
Control Module Industries	Enfield, CT
Cree Fayetteville	Fayetteville, AR
Delta Products	Fremont, CA
Electric Motor Werks	San Carlos, CA
ENGIE Storage	Santa Clara, CA
Envision Solar	San Diego, CA
EV-Charge America	Las Vegas, NV
EV Grid	San Dimas, CA
EverCharge	Oakland, CA
EV4	Portland, OR
Freewire Technologies	San Leandro, CA
Green Lots	San Francisco, CA

HRL Laboratories	Malibu, CA
Leviton	Melville, NY
Liberty Plugins	Santa Barbara, CA
Milbank Manufacturing	Kansas City, MO
Oasis Charger Corporation	Hartford, CT
Proterra: West Coast Manufacturing	City of Industry, CA
SGB-SMIT	Louisville, OH
Qualcomm	San Diego, CA
SemaConnect	Bowie, MD
Sevcon	Southborough, MA
Siemens Energy	Norcross, GA
Signet Systems	Lacey, WA
Telefonix	Waukegan, IL
TimberRock Energy Solutions	Frederick, MD
Tritium	Torrance, CA
WiTricity	Watertown, MA

Federal investment in manufacturing can accelerate the development of the domestic EVSE supply chain to support a swift transition to electric vehicles. The BIL makes significant manufacturing investments that could significantly support the domestic EVSE supply chain, including the \$3B Battery Manufacturing & Recycling Grant Program, and the \$3B Battery Material Processing Grant Program. Coupled with strong agency adherence to FHWA Buy America rules for EVSE, the BIL funding will support manufacturers with the initial capital investment needed for EVSE manufacturers and suppliers to establish or expand their facilities in the United States.

A robust nationwide EV charging network also requires a skilled workforce for installation and maintenance of the infrastructure. The Electric Vehicle Infrastructure Training Program (EVITP) is a safety-first program that prepares licensed electricians to install and maintain EVSE in new and existing buildings and facilities. EVITP is available in all fifty states, and will soon be available online. DOT can ensure that EVSE is installed to the utmost standards of safety and

efficiency—which will secure the public’s confidence in EVs while extending the longevity of the assets—by providing federal guidance that promotes the use of EVITP-certified electricians in the installation of all DOT-funded EVSE projects.

We urge DOT to establish a reliable, safe, and resilient basis for the national EV charging network through its guidance. This means supporting the development of a domestic EVSE supply chain by providing EVSE manufacturers with the certainty and stability they need to make informed decisions about where they’ll build their facilities and source their components, through strict adherence to FHWA Buy America requirements, and the BIL Build America, Buy America Act, for federally-supported EVSE investments. It also means leveraging the EVITP program to ensure that infrastructure is installed safely, by qualified personnel.

Robust Community Engagement for an Equitable Nationwide EV Charging Network

Response to Question #11: What topics do you suggest that we address in guidance on project development of EV charging infrastructure and hydrogen, propane, and natural gas fueling infrastructure at the State, Tribal, and local levels to allow for the predictable deployment of that infrastructure?

As DOT solicits applicants to its Charging and Fueling Infrastructure Program, it should strongly encourage applicants to allocate planning resources toward strong public participation/community engagement strategies.

The most effective infrastructure investments are those designed *by and for* the communities they serve. People hold valuable knowledge about their communities’ mobility needs; this knowledge should be leveraged to inform how and where EV charging infrastructure is located. Through robust participatory planning processes and community engagement programs, applicants can improve the effectiveness and utility of the infrastructure to the community, educate a broad swath of community members about the impact of the federal investments in their neighborhoods, and navigate the avoidable pitfalls that occur when public investments happen without strong community participation and acceptance—such as residential displacement. Urban planning scholarship reveals that residential leadership is key to improving neighborhoods without gentrifying them.⁷

Through implementation of the Charging and Fueling Infrastructure Program, DOT has the opportunity to set a high standard for community engagement requirements attached to federal investments in mobility infrastructure—a key component of equitable and effective infrastructure projects. DOT should encourage applicants to seek early design, planning, and implementation input from a wide range of community stakeholders, including organized labor representation (drivers, electricians, service workers, auto workers, EVSE manufacturers), community land trusts, disability rights advocates, local environmental and conservation

groups, safety advocates, transit advocates, housing advocates, and racial and environmental justice advocates. DOT should also make explicit that program funds may be used to support robust public participation/community engagement processes that make it easier for the public to participate; these expenses may include, but are not limited to, travel vouchers, onsite childcare, and financial compensation for participants' time and expertise.

The swift transition to electric vehicles on President Biden's ambitious timeline will depend on a range of factors, including the public's trust in, and acceptance of, the new technology. DOT's rollout of federal funding for EVSE infrastructure must acknowledge this reality by ensuring robust public participation/community engagement processes for federal investments in the nationwide EV charging network.

Equity-oriented research and non-profit organizations such as The Greenlining Institute, Transit Planning 4 All, the Participatory Budgeting Project, and the National Civic League have developed robust evidence-based best practices for participatory processes and community engagement.^{8, 9, 10, 11} **We urge DOT to look to these resources—and other scholarly works on equitable community development processes—to develop its guidance for program applicants, and ensure that the national public EV charging network is planned, designed, and implemented equitably.**

Thank you for the opportunity to comment.

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