



May 28, 2020

The Honorable Peter DeFazio
Chairman, Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Sam Graves
Ranking Member, Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Chairman DeFazio and Ranking Member Graves:

We are writing in support of the Committees' efforts to date to authorize a competitive grant program to help advance electric vehicle charging and alternative fuel refueling infrastructure adjacent to our nation's highway corridors under the U.S. Department of Transportation Federal Highway Administration's (FHWA's) Alternative Fuel Corridor Program.

With the transportation sector making up roughly a third of annual greenhouse gas emissions nationwide and approximately 41% of carbon emissions in some states like California, driving toward more zero-emission fuel options, including for medium- and heavy-duty vehicles (MHDVs), will require an aggressive buildout of infrastructure to meet demand for cleaner vehicles. At the same time, we have the potential to support the next generation of freight commerce transportation, including U.S. businesses relying on this infrastructure as they add zero-emission or alternative fueled vehicles to their fleets; and to drive economic growth in the U.S. electric vehicle supply equipment (EVSE) and alternative fuel equipment supply chains. This infrastructure buildout will support thousands of direct and indirect U.S. jobs across these industries.

CALSTART's Clean Corridor Campaign Coalition is an important partnership between fuel and infrastructure providers, vehicle manufacturers, fleet users, and station operators committed to accelerating the adoption of alternative fuel vehicles along the nation's corridors and transportation networks. CALSTART's commitment to clean charging and refueling corridors is well-established. CALSTART has been an important partner with FHWA in planning and executing Alternative Fuel Corridor Convenings in multiple regions across the United States. These convenings brought together critical stakeholders and state agencies to evaluate and plan the advancement and rolling expansion of nationally designated alternative fuel corridors, as defined by the FHWA. In addition, in May 2018 CALSTART formed a public-private partnership with the Environmental Protection Agency to facilitate the West Coast Collaborative Alternative Fuel Infrastructure Corridor Coalition (WCC AFICC). Through this partnership, CALSTART worked with over 200 public and private partners to perform a regional infrastructure needs assessment and overview of near-term infrastructure development opportunities





along critical freight corridors in California, Oregon, and Washington. CALSTART has also led some of the nation’s largest emission reduction programs including clean corridor initiatives to advance alternative fuel vehicle adoption, on both the West Coast and in the Northeast.

It is from this vantage point that we are greatly encouraged to see the Committees supporting needed federal infrastructure investments under the FHWA Alternative Fuel Corridor Program. We commend the U.S. Senate Committee on Environment and Public Works for advancing on a unanimous, bipartisan basis S.2302, “America’s Transportation Infrastructure Act of 2019” last year, which included a \$1 billion, five-year competitive grant program for electric vehicle charging and hydrogen and natural gas refueling infrastructure. We are also pleased that the U.S. House Committee on Transportation & Infrastructure is considering inclusion of such a grant program in upcoming surface transportation reauthorization legislation.

As the Committees continue to work towards a final vision for this program that might become law, CALSTART offers the following recommendations to help guide these important investments:

- Authorize a \$300 million/year, five-year program to provide robust funding for the Alternative Fuel Corridor Program competitive grant.**

In working with industry and public partners through the WCC AFICC, initial analysis on investment needed to build out the nation’s clean fueling trucking infrastructure showed capital expenditures could range up to \$100 billion over the next decade. A March 2020 voluntary study by CALSTART of medium- and heavy-duty alternative fuel vehicle infrastructure needs – including electric, hydrogen, and natural gas infrastructure – in California, Oregon, and Washington alone identified an estimated needed capital expenditure of nearly \$374 million.ⁱ This figure only represents a small fraction of the total need for MHDV alternative fuel infrastructure in the three west coast states. Corridor infrastructure buildout represents a significant economic opportunity, with a projected investment of \$3 billion creating up to 8,400 project direct jobs and significant indirect employment throughout the EVSE supply chain alone. As a down payment on critically needed investment nationwide, we support an investment of \$300 million per year over five years for a total of \$1.5 billion, or \$500 million more total over the amount proposed in S.2302, be made in upcoming surface transportation reauthorization legislation. Moreover, the Coalition recognizes that Alternative Fuel Corridors are not the only the only mechanism for building out alternative fuel infrastructure for medium- and heavy-duty nationwide, though as envisioned the program could help serve to fill critical gaps along our highways.
- Provide fair and equitable consideration of MHDV infrastructure for all types of alternative fuel commercial vehicles, including electric vehicle charging and hydrogen and natural gas refueling infrastructure.**

As the market for alternative fuel efficient and easier to maintain. Additionally, preserving U.S. manufacturing competitiveness in commercial vehicle production underscores the need for public investment in zero-emission and electric charging, hydrogen refueling, and natural gas refueling infrastructure along transportation corridors. To support federal investment that leverages all of these technologies for the unique demands of MHDV charging and refueling, a competitive grant program should be structured such that it offers fair consideration to grantees across all fuel types and charging or refueling infrastructure and

- **Support alternative fuel infrastructure fairly across the nation's highway system while allowing for regional diversity.**

Through the Federal Highway Administration's Alternative Fuel Corridor Designation Program, 46 states including the District of Columbia have submitted nominations for corridors for 100 interstates and 76 highways and state roads spanning 135,000 miles. Though the Program demonstrates the growing expansion and need of alternative fuel corridors, significant infrastructure gaps remain across fuels that require significant federal investment. There is also geographic diversity in fuel needs (including electric, hydrogen, natural gas) in the corridor nominations put forth by local jurisdictions. The Clean Corridor Campaign Coalition recommends that an Alternative Fuel Corridor Program competitive grant strike the right balance between making infrastructure investments across the United States' highway corridors while allowing for consideration in grantmaking decisions for regional alternative fuel vehicle needs. This could include allowing regional applications under the competitive grant, to the extent that such an approach will also allow for a fair nationwide investment approach consistent with Corridor program goals that are national in scope.

- **Encourage public agencies to engage stakeholders, including nonprofits and industry members, during grant design and execution.**

The Alternative Fuel Corridor competitive grant is a new mechanism that will require a new way of thinking at both the federal and state levels about how to effectively build out a wide range of infrastructure for all types of vehicles, including commercial trucks, along our nation's highways. Industry stakeholders including nonprofit entities have experience soliciting and assimilating diverse stakeholder feedback on the design and administration of alternative fuel infrastructure programs at the federal and state levels. These entities can both help form stakeholder consensus around effective programmatic grant design and execution, and partner with grantees to help facilitate effective and efficient use of taxpayer resources. As such, these stakeholders must be at the table with the eligible state entity and FHWA regional divisional office early on to help build consensus around a fair competitive grant process, should such a grant program become law. After funds are disbursed to grantees, nonprofit entities with experience administering state and local EVSE and alternative fuel infrastructure programs should be allowed to partner with grantees to promote more efficient and effective administration of taxpayer resources for shovel-ready projects, and to share best practices for administration of these funds with grantees.

In summary, expanding our national alternative fuel corridors is critical to enabling clean vehicle adoption and requires significant near-term federal investment in infrastructure.

Expanding clean vehicle and truck highway infrastructure corridors and incentivizing the deployment of clean trucks are high-impact investments that will expand domestic vehicle and component manufacturing and highway corridor construction jobs while providing U.S.-based vehicle manufacturers a competitive global advantage – all while supporting next generation of freight commerce and tackling truck freight emissions. Such investment has the potential to not only contribute to needed greenhouse gas emissions reductions in the transportation sector, but also significantly enhance workforce development opportunities in a growing clean transportation industry during this time of uncertainty and unemployment amid the COVID-19 pandemic.

CALSTART and the members of the Clean Corridor Campaign Coalition look forward to continuing to work with the Committees to make this important infrastructure investment a reality, and to ensure that it provides broad benefits to stakeholders in the alternative fuel vehicle infrastructure supply chain and to infrastructure operators. Thank you for your commitment to this important program.

Sincerely,

Air Liquide
Amplify
Arrival
BYD Motors LLC
CALSTART
ChargePoint
Clean Fuels Ohio
ClipperCreek
DTE
Electriphi
Greenlots
Hubject
Morgan Olson
National Grid
Nikola Corporation
SDG&E
SoCalGas
South Coast AQMD
Trillium
US Gain
Volvo Group
XOS

ⁱ CALSTART, “Medium and Heavy-Duty Alternative Fuel Infrastructure Strategic Development Plan,” March 2020, <https://westcoastcollaborative.org/files/sector-fuels/wcc-aficc-mhd-infrastructure-development-plan-2020-03-12.pdf>.