[Date]
To: [City Contact]
[Address Line 1]
[City], CA [Zip]
Transmitted via email to [city contact]

SUBECT: SCAG Contract No 20-057-C01 EV Charger Station Study DRAFT EV Policy Memoranda for [City]

This memo has been prepared to assist [city] understanding its current progress to be fully complaint with California Assembly Bill (AB) 1236 which requires cities to update and streamline its EV charging station permitting requirements. This memo also describes additional best practices recommended by Willdan and California's 2019 Governor's Office of Business and Economic Development (GOBIZ) EV Charging Permitting Guidebook to further foster EV charger installations within the City.

AB 1236 Requirements

Permitting requirements and prolonged approval timelines have been, and still are, significant barriers for electric vehicle supply equipment (EVSE) installation projects. To ensure consistency in process and encourage permitting of electric vehicle (EV) charging stations, California passed Assembly Bill 1236 in October 2015 requiring all Cities to develop streamlined EV charging station permitting protocols by September 30, 2017. The legislation is designed to create uniform standards to facilitate permitting and decrease overall electric vehicle supply equipment (EVSE) installation costs to support increased EV ownership. Table 1 summarizes AB1236's requirements and the City's current progress in meeting them. Recommended actions or improvements to meet any deficiencies are also included. For requirements that have been met, stretch goals have been suggested.

Table 1 Summary of [City] Compliance with AB 1236

AB 1236 Requirements	City Compliance	Recommended Action or Improvement
Ordinance creating an expedited, streamlined permitting process for Electric Vehicle Charging Stations (EVCS) including Level 2 and Direct Current Fast Charger (DCFC) has been adopted	Compliant/ Not Compliant	
Checklist of all requirements needed for expedited review posted on County or City website	Compliant/Not Compliant	
EVCS projects that meet expedited checklist are administratively approved through building or another non-discretionary permit	Compliant/Not Compliant	

AB 1236 Requirements	City Compliance	Recommended Action or Improvement
EVCS projects reviewed with focus on health and safety	Compliant/Not Compliant	
Authority Having Jurisdiction (AHJ) accepts electronic signatures on permit applications	Compliant/Not Compliant	
EVCS permit approval not subject to approval of an association (as defined in sec. 4080 of Civil Code)	Compliant/Not Compliant	
AHJ commits to issuing one complete written correction notice detailing all deficiencies in an incomplete application and any additional information needed to be eligible for expedited permit issuance	Compliant/Not Compliant	

GOBIZ Best Practices

California's 2019 Governor's Office of Business and Economic Development (GOBIZ) EV Charging Permitting Guidebook[1] includes best practices for cities to follow, facilitate, and expedite the EV charger station permitting process. Table 2 summarizes the progress made by [city] in relation to these best practices.

Table 2 - Summary of [City] meeting AB 1236 Best Practices

AB 1236 Best Practices	City Status	Recommended Action or Improvement
Clear EVCS permitting process detailed on website	Met/Not Met	
Zero Emission Vehicle (ZEV)permitting ombudsperson appointed to help applicants through entire permitting process	Met/Not Met	
Guidance documents for permitting and inspecting charging stations at single family home, multifamily home, workplace, public and commercial medium and heavy duty posted on website	Met/Not Met	
Preapplication meetings with staff offered	Met/Not Met	
AHJ has published bulletin or ordinance that states EV charging space counts as one or more parking spaces	Met/Not Met	
Concurrent reviews are made available for building, electrical and planning (if necessary)	Met/Not Met	
Planning for EV and related infrastructure incorporated in general plan, capital improvement plan, climate action plan and design guidelines	Met/Not Met	
EVCS classified as accessory use, not as a fueling station	Met/Not Met	

[1] California's 2019 Governor's Office of Business and Economic Development (GOBIZ) EV Charging Permitting Guidebook

AB 1236 Best Practices	City Status	Recommended Action or Improvement
AHJ established timelines that are expedited compared to standard building permit review timelines	Met/Not Met	
AHJ conditionally approves permits ("approved as noted")	Met/Not Met	

Additional Best Practices and Considerations

Beyond just AB 1236, Willdan's experience working with other cities, and public agencies on multiple transportation electrification and EVCS installation projects has given us valuable insight into what makes EV project implementation successful.

Additional Best Practices & Stretch Goals

Setting Tangible Targets and Goals
To make transportation electrification efforts more tangible, [City] should consider establishing a timeline to install a target number of chargers. The California Energy Commission (CEC) projects that about 968,000 chargers will be needed statewide to support 5 million electric vehicles by 2030; approximately 1 charger for every 5 vehicles[2]. Based on the population of [city] and car ownership rates this translates to approximately [insert calculations] chargers by 2030 to support [calculate% of 5M EVs by population] electric vehicles.

The City of Los Angeles has been a great example of setting tangible goals and then meeting them. In their 2019 Sustainable City pLAn, Los Angeles Department of Water and Power (LADWP) set a goal of installing 10,000 EV charger stations by 2022, and 28,000 EV charger stations by 2028[3]. The City of Los Angeles met their first target 2 years ahead of schedule, installing over 11,000 EV charging stations by January 1, 2021[4]. Their success can be attributed to factors such as generous incentives from LADWP and other agencies installing EV charging stations as part of their own needs. The Bureau of Street Lighting has specifically targeted LED retrofitted streetlights for curbside EV charging. While [city] may not have access to LADWP's incentive programs, SCE is launching their Charge Ready 2 program which is expected to provide generous incentives towards EVCS infrastructure and rebates on charging stations[5].

[City] can also set target goals for electrification transition of the city owned vehicles. While there are several regulations and state goals in the works to require public and private fleets to

[2] Crisostomo, Noel, Wendell Krell, Jeffrey Lu, and Raja Ramesh. January 2021. Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment: Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030. California Energy Commission. Publication Number: CEC-600-2021-001
[3] https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf
[4] https://www.lamayor.org/mayor-garcetti-announces-city-has-helped-install-10000-ev-chargers
[5] https://energized.edison.com/stories/sce-gets-green-light-for-expanded-ev-charging-program

electrify their vehicles over the next 15-20 years, [city] can still plan to get ahead of this timeline. A public announcement would set an example for the community that electric vehicles are a viable option for a variety of use types. For example, in 2013, Hermosa Beach implemented a local policy that new city owned vehicles be either an alternative fuel or zero emission whenever feasible to reduce their greenhouse gas impact. Hermosa Beach installed the infrastructure needed to support these vehicles as part of the policy. A copy of their memorandum is contained in Appendix A.

Parking, Signage, and Enforcement

EVs still require 30 minutes, or longer, to charge, even with Level 3/DC Fast Chargers; therefore, clear signage that directs EV drivers where to park and charge will help ensure a positive and safe user experience. It will also help denote where non-EV drivers cannot park to ensure spots are left open for EV charging. While not very common, non-EVs have been noted to occasionally park in EV charging spots. As EV ownership increases, the need for consistent signage and enforcement of parking policies may increase. The City can reference the California Plug in Vehicle Collaborative which provides sample EV parking and charging signage[6]. The California Plug in Vehicle Collaborative provides additional information related to accessibility requirements for EV parking spaces. California manual of uniform traffic control devices contains updated directions and guidance for EV related signage placed on public streets[7].

Local Codes and Ordinances

It is recommended that local building codes or ordinances be updated to require EV spaces for new construction or large renovation projects. California 2019 Green Building Code requires set minimums of EV spaces and accessibility requirements for new construction of multifamily residential and nonresidential new construction[8]. Per the latest code, EV spaces do not currently require EV chargers, but must install infrastructure and have available capacity for future installations. The City should adopt these codes under local ordinance and as a stretch goal consider increasing the minimum percentage requirements and/or requiring EVCS to be installed as part of the project. As another stretch goal, [the City] can expand EV space and infrastructure requirements to minor building retrofits and alterations, which are not subject to new construction building codes. CEC's assessment of EV charging infrastructure finds that new construction building codes alone may not be enough to meet EV demand in 2030[9]. It may be cost prohibitive to include EV infrastructure in building retrofits; therefore, technology options such as mobile charging or sharing multiple chargers on a circuit should be allowed as options to meet local requirements.

[6] https://www.calbo.org/sites/main/files/file-attachments/ca_accessibility_for_ev_charging.pdf
[7] https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/f0018447-13-01-a11y.pdf
[8] 2019 California Green Building Standards Code California Code of Regulations, Title 24, Part 11
[9] Crisostomo, Noel, Wendell Krell, Jeffrey Lu, and Raja Ramesh. January 2021. Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment: Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030. California Energy Commission. Publication Number: CEC-600-2021-001

City of Los Angeles also creates a great example of updating building codes to foster EV adoption and going above and beyond CA 2019 Green Building Code requirements. City of Los Angeles currently requires new multiunit dwellings (MUDs), hotels and motels to set aside 30% of parking spaces for EV spaces and installation of EVCS in 10% of total parking spaces. Greater than the 6-8% of parking spaces indicated in the CA 2019 Green Building Code. Setting larger EV space requirements should be considered within [city's] expected EV adoption rate as sites may not want to unnecessarily limit available parking stalls for non-EV drivers.

Funding

The GOBIZ guidebook recommends that cities post guidance for EV permitting on their websites or linked to online permitting software as pop-up adverts. This can be included on a separate EV landing page to include other EV related resources such as funding opportunities and incentives. In several instances funding is prioritized for Disadvantaged Communities (DACs) and should be highlighted on the City's website.

EV Purchase Rebates and Incentives
Funding is a common barrier for property owners to install EV charging stations. [City] should consider providing information related to available incentives towards electric vehicle purchases, electric vehicle charger purchases, and EVSE infrastructure. Examples include: https://cleanvehiclerebate.org/eng, https://www.cleanfuelreward.com/ and https://calevip.org/ The clean vehicle rebate program has increased incentive values for low-income individuals.

Utility Incentives and Coordination
Coordination with utilities is critical for large EVSE buildouts, in particular for projects that include DCFC, as it is likely that significant site upgrades and utility infrastructure may be required. [City] is within Southern California Edison territory, which will be launching their Charge Ready 2 program soon. Charge Ready 2 is expected to cover infrastructure costs for new EV chargers at MUDs and other public sites, as well as provide rebates towards qualified EVSE. the program will help make EVSE installation projects more economically viable. The city may want to consider directing site developers to this program during the permitting process.

Low Carbon Fuel Standard (LCFS) and Credits
Under AB32, California created the low carbon fuel standard to reduce GHG emissions from the transportation sector. The goal is to decrease the carbon intensity of the CA transportation fuel pool, 20% by 2030, and provide incentives for low carbon alternative fuel sources. Fuel providers can generate credits for producing low carbon fuels, including dispensed electricity from public and fleet EV charging stations. Credit values fluctuate over time but are currently trading at upwards of $200/credit. Fuel data, metered energy usage, must be reported quarterly to CARB. The total number of and value credits generated will be impacted by the carbon intensity of the electricity used and the amount of electricity dispensed from the chargers, but the current credit value translates to approximately $0.15/kWh. Municipalities can use this LCFS revenue to offset EVS infrastructure costs, hardware costs, and other ongoing costs (maintenance, networking fees, etc.) not recovered by selling electricity.

Mobile Source Air Pollution Reduction Review Committee (MSRC)
The Mobile Source Air Pollution Reduction Review Committee (MSRC) has invested more than $400 million in clean transportation projects in Southern California since 1990. The organization includes most of Southern California and contains South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), San Bernardino County Transportation Authority (SBCTA), Los Angeles County Metropolitan Transportation Authority (LACMTA), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC), and California Air Resource Board (CARB) as member agencies. Recently MSRC has funded new EV purchases and EVCS installation projects at Costa Mesa, Brea, Los Angeles, Rialto, Hemet, and Highland. MSRC regularly posts requests for proposals for Cities to apply for funding for specific clean transportation projects[10].

Sample Language and Templates

Appendix A includes sample language on how other cities within the SCAG region have adopted EV policies. California Building Officials has developed an AB1236 toolkit to assist cities within complying with the regulation. Appendix A includes these toolkits as well as draft language [city] to use for ordinances and a template staff report for formal adoption. In addition, a copy of City of Monrovia's checklist for commercial and residential EVCS installations is included as a reference for [city] to create their checklists.

Summary of Findings

Currently [city] meets [X] of seven (7) of AB 1236 requirements [X] of 10 recommended best practices from California's GOBIZ EV Charging Permitting Guidebook. The City [is close/needs to take multiple steps] to come into compliance with AB 1236. While the State has not enforced this bill with any penalties, it is important that [city] work expeditiously to update their EVSE permitting protocols to support the growing demand for EVs throughout the SCAG region.

Appendix A contains additional resources to help [city] meet the state's goals of a streamlined EVSE permitting system. [summarize key steps and reference sample material/examples from other cities to bring into compliance.]

Respectfully submitted,
Willdan

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Project Manager

[10] http://www.cleantransportationfunding.org/current-rfps-solicitations

Appendices