



OFFICE OF THE MAYOR

MIAMI-DADE COUNTY

June 27, 2022

Jared W. Perdue, P.E.
Secretary
Florida Department of Transportation
605 Suwannee Street
Tallahassee, Florida 32399-0450
Via Email: jared.perdue@dot.state.fl.us

Secretary Perdue,

We appreciate the efforts of the Florida Department of Transportation (FDOT) to support expansion of Electric Vehicle Supply Equipment (EVSE) in our State including submission of a Round 6 Alternative Fuel Corridor Nomination Application to the Federal Highway Administration (FHWA) which recommended nomination of an additional four corridors in Miami-Dade County. We look forward to the release of the State's Electric Vehicle Charging Investment Plan to further support expansion of EVSE along these corridors. The County's Climate Action Strategy supports actions to accelerate community-wide adoption of electric vehicles and we remain committed partners in FDOT's efforts to that end.

On June 9, 2022, the Federal Highway Administration issued a Notice of Proposed Rulemaking (NPR) outlining proposed minimum standards and requirements for projects funded under the National Electric Vehicle Infrastructure (NEVI) Formula Program and other Title 23, US Code programs. The document is currently open for a 60-day comment period. Miami-Dade County has identified key issues with the proposed standards and will provide comments within the 60-day window. Since Florida's Electric Vehicle Charging Investment Plan will be due to USDOT prior to the end of the comment period and subsequent release of final standards, Miami-Dade County strongly encourages FDOT to reflect the following considerations within its plan:

- 1) The NEVI Formula Program Guidance, published by FHWA on February 10, 2022, defines "build out" of the State network to include the deployment of at least four DC fast chargers located within one mile of the Alternative Fuel Corridors spaced no more than 50 miles apart. This approach fails to account for the fact that demand for EVSE is directly related to the volume of traffic on the corridor. Further, residential areas located along roadways with high traffic volumes are

disproportionately impacted by tailpipe vehicle emissions¹ and stand to gain the most from the switch to electric vehicles. These benefits would be realized most directly in disadvantaged communities due to historical inequities in the siting of transportation infrastructure. Through the NOPR, FHWA is specifically requesting comments on whether a different number of DCFC ports should be required at NEVI Formula Program funded charging stations. Miami-Dade County strongly encourages FHWA and FDOT to develop a methodology that defines build out based on DC fast charger density in relation to traffic volume on the Alternative Fuel Corridor. Ensuring an adequate density of EVSE is particularly critical to support emergency evacuation. Ahead of Hurricane Irma, almost 700,000 Miami-Dade County residents were under evacuation orders, placing a significant strain on evacuation routes and fuel supply.

- 2) The NOPR states that renewable energy generation and storage, such as on-site solar panels, would be eligible for funding under the NEVI Formula Program "if it leads to lower overall construction and operating costs". The deployment of renewable energy generation and storage systems to support EVSE are likely to lead to higher construction costs, however, this standard fails to recognize the additional benefits associated with such systems. The effect of electric vehicle adoption on overall greenhouse gas emissions reductions is contingent upon the fuel mix of the grid to which the electric vehicles connect. The deployment of renewable energy generation and storage systems in conjunction with EVSE confers the added benefit of ensuring that EV charging is supported by clean, renewable energy sources. Miami-Dade County strongly encourages FHWA to remove the requirement that renewable energy generation and storage must result in lower overall construction costs and strongly encourages FHWA and FDOT to promote the deployment of renewable energy sources in conjunction with NEVI-funded EVSE.
- 3) The proposed NEVI standards and regulations allow for the installation of AC Level 2 chargers only after the required four DC fast chargers have been provided. The consumer cost of DC fast charging is generally significantly higher than Level 2 charging making it less practical to serve low-income communities. Miami-Dade County strongly encourages FDOT to include within the Electric Vehicle Charging Investment Plan a plan for deployment of longer-dwell parking locations, particularly those serving disadvantaged communities.

We look forward to coordinating with FDOT on the deployment of EVSE. Please feel free to contact me if you would like additional clarification on these comments. These comments will also be provided in response to FDOT Request for Information No. 01478.

Sincerely,



Jimmy Morales
Chief Operations Officer

c. April Combs, FDOT, Central Office
Javier Rodriguez, FDOT, District 6
Daniel Lameck, FDOT, District 6

¹ US Department of Transportation website. Accessed on June 23, 2022 at: <https://www.transportation.gov/mission/health/cleaner-air#:~:text=Vehicle%20emissions%20contribute%20to%20the,illnesses%2C%20including%20pneumonia%20and%20Obronchitis.>