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Submitted via CARB electronic portal

Date: November 7, 2023
To: California Air Resources Board
From: Beth Burks, Executive Director
Re: **Electrify America’s Cycle 4 ZEV Investment Plan**

The Humboldt County Association of Governments, in its authority as the Regional Transportation Planning Agency, appreciates the opportunity to submit comments on the fourth 30-month Zero-Emission Vehicle Investment Plan (Cycle 4 ZVIP) from Volkswagen subsidiary Electrify America.

We understand that Electrify America’s Cycle 4 ZVIP intends to mostly invest in station upgrades for stations installed in Cycles 1 & 2, as they state, “In Cycle 4, the focus has shifted from the aggressive network expansion of previous cycles to delivering a consistently reliable charging experience.” From our reading, Humboldt County, as well as adjacent counties of Del Norte, Trinity, and Mendocino, is not considered for either the approximately \$172 million in infrastructure or the approximately \$8 million in marketing investments in California in Cycle 4.

We would like to call attention to the limited access to EV chargers surrounding our area. Electrify America’s *Cycle 4 ZVIP* shows “Zones for potential new sites (low and high)” in California (Figures 13 and 14, page 27). In the reproduced figure, you can see that rural considerations for Humboldt County (red outline), as well as Del Norte, Trinity, and Mendocino counties, seem to not be part of the Cycle 4 ZVIP.

One anecdote helps exemplify the EV-infrastructure gap we have. A staff person from the local Air Quality District was informed that electric vehicles cannot be delivered to Humboldt except by being bussed (by an ICE vehicle), due to insufficient charging capabilities to get it from



Redding or San Leandro to Eureka.

Cycle 4 ZVIP states,

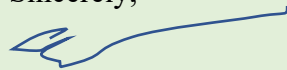
Second, initial buildout efforts have focused on enabling long-distance travel to alleviate range anxiety at the expense of utilization. Most highway sites are underutilized, but the density is necessary to enable long distance travel. ... However, as a key component of Electrify America's mission to enable EV adoption, Electrify America will also continue to develop highway sites to enable long-distance travel and alleviate range anxiety" (under 5.4.2 Investment Selection Methodology for Network Growth).

We would like to see more investment opportunities for "highway sites to enable long-distance travel" to make EV trips possible to and from Humboldt County. Business owners, employees, and suppliers regularly take long-distance trips from Humboldt, driving either Highway 101 (north-south) or Highway 299 and Interstate 5 (east-west). Similarly, residents and visitors of Humboldt County commonly and consistently drive long distance—from 150 to 300 miles to Redding, Santa Rosa, or the San Francisco Bay Area—to reach medical services that are not available any closer. Residents and visitors also first drive to San Francisco, Santa Rosa, or Medford (OR) airports for the majority of their airplane flights.

Presumably, it could be possible to consider Humboldt County for National Electric Vehicle Infrastructure (NEVI) sites within our county due to the distance between chargers. However, per the manual for GFO-23-601–CA NEVI Formula Program, none of the corridor groups are in our region, thus Humboldt County is not eligible for the first round of \$40.5 million.

Thank you for your thoughtful consideration of the investment and infrastructure challenges in the rural areas of California. We urge the California Air Resources Board to find meaningful ways to support investments that will effect continued EV adoption in the North Coast.

Sincerely,



Beth Burks
Executive Director