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June 17, 2022

Subject: **Recommendations for Language to Strengthen Transportation Provisions of Climate Bill, Amendment S.2842**

Dear Representative Roy, Representative Chan, Representative Jones, Senator Creem, Senator Barrett, and Sen. Tarr:

We write as the Zero-Emission Vehicles ("ZEV") Coalition to comment on the transportation provisions of the climate bill. The ZEV Coalition consists of 35+ organizations and local groups working on electric vehicle policy, advocacy, and education. The legislation that the conference committee has before it includes components related to offshore wind, solar, buildings, and electric vehicles ("EV"). This letter focuses on the transportation related provisions in S.2842, An act driving climate policy forward. We support the following provisions in the Senate Climate Bill: 12, 34, 35, 38, 43, 52, 53, 56, 57, 58, 64, 67, 71, 75, 76, 78, 79, and 80. These provisions together represent a large step towards reducing greenhouse gas emissions in the transportation sector by:

- **Putting in place policies to accelerate the rate of EV adoption,** such as codifying an incentive for the purchase of EVs (light-duty, medium- and heavy-duty), including implementing a point-of-sale rebate, calling for electric distribution companies to offer off-peak charging rebates that include all the benefits of charging off-peak, and codifying 2035 as the date by which all new vehicle sales will be electric;

- **Planning for the build-out of charging infrastructure**, including building out charging infrastructure along key travel corridors, coordinating state efforts to make charging accessible to all, financially supporting the build-out of charging, and updating building codes;
- **Setting timelines for the electrification of MBTA buses and commuter rail**, supporting the electrification of Regional Transit Authorities, beginning to address school bus electrification, and calling for EV standards for vehicles owned by transportation-network companies like Uber and Lyft; and
- **Increasing air quality monitoring** so that the Commonwealth can target interventions and track their success to improve air quality for residents currently most burdened by the harmful localized air pollution caused by our transportation system's reliance on burning gasoline and diesel fuels.

We urge the conference committee to incorporate the above elements into a final climate bill. In addition, we offer the following suggestions to strengthen the language.

- Section 34: **Increase the upper rebate limit for medium- and heavy-duty EVs**
    - We support the creation of the $100 million Electric Vehicle Adoption Incentive Trust Fund and the point-of-sale incentives, including the additional $1500 rebate for low-income consumers, for the purchase of electric cars or light-duty trucks. However, Section 34 limits incentives for electric medium- and heavy-duty vehicles ("MHDV") to $6,000. Currently, MOR-EV Truck rebates start at $7,500 for Class 2b vehicles and increase to $90,000 for Class 8 vehicles.[1] As written, Section 34 would effectively remove rebates for vehicles of Class 3 and above. Since larger MHDVs disproportionately contribute to the localized air pollution that harms human health, we encourage the upper rebate limit to be raised in consultation with DOER so that the state incentive program is able to support the electrification of larger MHDVs.
- Section 38: **Require EV-Installed and EV-Ready parking spaces to increase electric vehicle adoption**
    - The lack of sufficient charging infrastructure remains one of the biggest barriers to EV adoption. It is estimated that MA will need 21,000 charging stations by 2025. Currently we have fewer than 5,000.[2] Overcoming this charging-access shortfall requires a greater focus on expanding charging access to multifamily unit dwellings, workplaces, commercial properties, and parking facilities. S.2842 requires that 10 percent of parking spaces in new residential, commercial, and

[1] MOR-EV Trucks, https://mor-ev.org/mor-ev-trucks

[2] Massachusetts needs at least 750,000 electric vehicles on the road by 2030. We are nowhere close, Boston Globe, April 9, 2022 https://www.energycodes.gov/sites/default/files/2021-07/TechBrief_EV_Charging_July2021.pdf.

parking facilities be EV parking spaces. We urge the legislature to require 100% of parking spots in new residential construction to be EV ready and for 25% of parking spots to be equipped with electric vehicle charging stations. For new commercial construction and parking facilities, 25% of parking spots should be equipped with charging stations and an additional 25% of parking spots should be EV ready.

- Section 39: **Add a requirement for fleets owned by transportation network companies ("TNC") to be electric by 2025 and all procurements in 2023 should be for ZEV**
    - We support language in S.2842 that requires the Commonwealth to establish vehicle electrification targets for TNCs. To support this transition, we recommend making available financing options for high mileage low- and moderate-income drivers. Fleets owned or operated by TNCs should be electric by 2025 and all new vehicle procurement should be electric starting 2023. In addition, we recommend requiring TNCs to financially support drivers in transitioning to ZEVs.
- Section 52: **Strengthen zero-emission targets for the MBTA bus fleet**
    - S.2842 phases out MBTA fossil fuel bus purchases in 2027. This means that several of the diesel-hybrid buses that the MBTA plans to procure will likely remain on the roads well beyond the 2040 full electrification target, to meet the Federal Transit Administration requirements of keeping buses for a minimum of 14 years. We urge the Commonwealth to lead by example and strengthen the provision in Section 52 to require all new MBTA bus procurements to be electric by January 1, 2023, and for the MBTA bus fleet to be all-electric by 2030.
- Section 53: **Set commuter rail electrification targets that are in line with the state's emission reduction goals**
    - We welcome the provision requiring the MBTA to develop short-term, medium-term, and long-term plans for each commuter rail line that includes target electrification dates. We strongly recommend that the language in Section 53 be expanded to include full electrification of all commuter rail lines by 2035 and prioritize the electrification of the Providence Line, Fairmount Line, and Newburyport/Rockport Line by December 31, 2024.
- Section 57: **EEA shall convene interagency council to implement EV charging infrastructure plan and set targets for expansion of charging infrastructure to support 100% of new vehicle sales to be electric by 2030**
    - Section 57 tasks this interagency council with creating a plan to deploy EV charging infrastructure that is equitable, interconnected, accessible, and reliable. EEA shall convene the council by March 1, 2023. However, the interagency council's plan must also be *adequate*: it must support enough Massachusetts drivers to switch from fossil-fuel powered vehicles to EVs to meet our 2030 goal.

The latest draft of the Clean Energy & Climate Plan puts that number at 900,000 by 2030. The current draft of the Advanced Clean Cars II regulations will require 68% of each manufacturer's sales to be electric by 2030. Massachusetts must aim high and plan for charging infrastructure that supports 100% of new vehicle sales to be electric by 2030 to ensure the Commonwealth meets its 2030 and 2035 climate requirements. In addition, this council should consider not just light-duty vehicles but the electrification of MHDVs, such as buses, trains, and delivery vehicles, in its infrastructure planning.

- Add New Section: **Require fleets targets**
    - In addition to the MBTA bus and commuter rail electrification targets identified above, we recommend the following timeline for electrification of vehicle fleets more broadly, meaning all public motor vehicle fleets and motor vehicle fleets serving a public purpose: (a) fifty percent of all public motor vehicle fleets and motor vehicle fleets serving a public purpose be electric vehicles by 2025; (b) seventy-five percent of all public motor vehicle fleets and motor vehicle fleets serving a public purpose be electric vehicles by 2030; and (c) one hundred percent of all public motor vehicle fleets and motor vehicle fleets serving a public purpose be electric vehicles by 2035.

In addition to incorporating the attached content, it is crucial that the Legislature establish an ongoing sustainable source of funds to support the implementation of a just transition to transportation electrification. Particularly in the case of transit electrification, it is crucial that the legislature create a fund to support the purchase of electric buses, advance electrification of the commuter rail, and construct modern maintenance facilities. Moreover, we acknowledge that there are funds available through federal competitive grant programs, which require state matching funds. To take advantage of the federal funds available, we support working through a new complementary bill that creates the investments necessary to achieve the objectives outlined here.

If you have questions, please contact Staci Rubin (srubin@clf.org) and Veena Dharmaraj (veena.dharmaraj@sierraclub.org).

Sincerely,

Members of the ZEV Coalition

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