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# ITS AMERICA

# SUSTAINABILITY AND RESILIENCY POLICY

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## Light Duty Vehicles

### Introduction

Increased deployment of light-duty zero-emission vehicles (ZEVs) will provide significant environmental benefits. ITS America's light-duty vehicle policy is intended to encourage consumers' continued adoption of ZEVs primarily through the provision of financial incentives. This includes increasing the tax credit volume cap for each manufacturer, at a minimum maintaining the current tax credit levels, and increasing access to the tax credit incentive by making the credit refundable and transferable. ITS America also supports increasing access and ensuring ZEVs stay on the road for as long as possible by establishing a used ZEV tax credit and providing incentives for EV battery replacement. ITS America also supports incentives for ZEV micromobility vehicles, such as e-bikes and e-scooters.

### Policy Recommendations

1. Support continuing and expanding federal incentives to increase the deployment of zero-emission vehicles (ZEV), including battery electric vehicles and hydrogen fuel cell vehicles.
  - 1.1. Support tax credits for the purchase or lease of ZEVs.
    - 1.1.1. At a minimum, maintain current tax credit levels for the purchase or lease of currently-eligible types of vehicles.
    - 1.1.2. Increase the tax credit volume cap for each manufacturer.
    - 1.1.3. Make the tax credit refundable to ensure these tax credits can be utilized by individuals with low tax liability.
    - 1.1.4. Allow tax credits to be transferable to allow purchasers to realize the financial incentive at the time of sale.
    - 1.1.5. Support programs that incentivize the early adoption of ZEV micromobility vehicles including but not limited to e-bikes and e-scooters.
  - 1.2. Ensure that ZEVs remain in use for as long as possible.
    - 1.2.1. Establish a used ZEV tax credit to support the purchase of ZEVs in the secondary market. The credit would be provided once per vehicle and could be a set value or be tied to the current market value of the vehicle.
    - 1.2.2. Support federal repowering incentives for EV battery replacement to ensure EVs can continue to be used beyond the life of the original batteries.

## Medium- and Heavy-Duty Vehicles

### Introduction

In addition to light-duty vehicles, the deployment of medium- and heavy-duty ZEVs will provide significant environmental benefits. ITS America supports federal incentives for zero-emission medium- and heavy-duty vehicles, including point-of-sale rebates or tax credits for the purchase of these vehicles, a broad definition of qualifying vehicles, and a phase-out based on a defined time period rather than adoption rates. ITS America also supports federal incentives for the purchase and deployment of zero-emission transit vehicles, school buses, and associated charging and fueling infrastructure.

### Policy Recommendations

2. Support federal incentives for the purchase of zero-emission electric and alternative fuel medium- and heavy-duty vehicles.
  - 2.1. Support federal point-of-sale rebates for the purchase of medium- and heavy-duty zero-emission vehicles. In the absence of a point-of-sale rebate, support the use of tax credits to incentivize the purchase of these vehicles.
  - 2.2. Support permissive language on what is considered as a qualifying medium- or heavy-duty zero-emission vehicle, particularly concerning weight limits.
  - 2.3. Ensure that phase-out requirements do not disincentivize widespread adoption of zero-emission vehicle technology in medium- and heavy-duty commercial vehicles. Support phase-out requirements that sunset over a fixed time period, rather than in relation to adoption rates.
3. Support federal policy to incentivize the purchase and deployment of zero-emission transit vehicles and associated infrastructure.
  - 3.1. Support increased federal funding for the purchase and deployment of zero-emission transit vehicles and associated charging and fueling infrastructure.
  - 3.2. Support a zero-emission transit vehicle public education campaign to communicate the many benefits of transitioning to zero-emission transit fleets.
4. Support federal policy to incentivize the purchase and deployment of zero-emission school buses and other public-sector owned vehicles and associated infrastructure.
  - 4.1. Support increased federal funding for the purchase and deployment of zero-emission buses and other public-sector owned vehicles and associated charging and fueling infrastructure.

## Zero-Emission Vehicle Charging and Fueling Infrastructure and Use of Rights-of-Way

### Introduction

The buildout of a charging infrastructure network is a significant factor in the successful deployment of ZEVs. This includes providing State Departments of Transportation and local governments with the ability to deploy charging and fueling infrastructure, including by eliminating the 23 USC 111 prohibition of commercialization within the highway rights-of-way, providing more flexibility for the deployment of charging and fueling infrastructure, providing federal funding and other incentives to support this infrastructure deployment, and providing funding for associated infrastructure along ZEV charging and fueling corridors. ITS America also supports providing federal incentives for the purchase and installation of charging infrastructure by individuals and non-public organizations, including at residential, multi-unit residential, and commercial buildings.

### Policy Recommendations

5. Ensure Rights-of-Way can be utilized to achieve sustainability priorities while also balancing the needs of state and local governments to manage and preserve these rights of way for safety and mobility.
  - 5.1. Support efforts to reverse the Section 111 prohibition of commercialization in highway rights-of-way.
    - 5.1.1. Support the recent FHWA guidance on rights-of-way use but seek an additional change to allow for commercialization at rest areas and park-and-rides and inductive charging in travel lanes.
    - 5.1.2. Support legislative and regulatory efforts to permanently reverse Section 111.
    - 5.1.3. Support efforts to ensure that FHWA's guidance supersedes rights-of-way limitations imposed by previous state agreements.
  - 5.2. Support legislative language providing flexibility for the deployment of ZEV charging and fueling infrastructure.
    - 5.2.1. Support legislative language providing states more flexibility in the method and amount of rates being charged for electric vehicle charging.
    - 5.2.2. Support legislative language to allow states and local governments to install ZEV charging and fueling infrastructure on publicly-owned properties.
    - 5.2.3. Support legislative language allowing states and local governments to partner with private entities to expand public and private ZEV charging and fueling networks.
  - 5.3. Support policy to make eligible funding for renewable energy projects in the Interstate rights-of-way for transportation use by states and localities for transportation related facilities (conversion and/or removal of existing lighting systems to high efficiency technologies, alternative fueling infrastructure, maintenance buildings, rest areas, etc.) on-site (including through net metering) or off-site through off setting electricity bills at other sites.

- 5.4. Amend federal law to allow for public electric vehicle charging stations to be installed at rest areas, park-and-rides along federal-aid and Interstate rights-of-way, and state or city property subject to local zoning.
6. Support increased federal funding or other incentives for ZEV charging and fueling infrastructure for light-duty vehicles.
  - 6.1. Provide federal funding or other incentives to support the deployment of ZEV charging and fueling infrastructure.
    - 6.1.1. Support federal funding or other incentives for the purchase and installation of non-proprietary charging and fueling infrastructure by state and local governments and made available to the public.
      - 6.1.1.1. Includes the installation of charging infrastructure in rights-of-way and through the use of existing physical infrastructure (such as combining EV charging with street light infrastructure).
    - 6.1.2. Ensure that a certain minimum percentage of federal funding dedicated to a ZEV charging and fueling deployment program is provided for the deployment of charging and fueling infrastructure in low-income communities.
  - 6.2. Support the establishment of a tax credit or rebate for the purchase and installation of EV charging infrastructure by individuals and non-public organizations.
    - 6.2.1. Private residences would qualify for a tax credit or rebate for the purchase and installation of either proprietary or non-proprietary EV charging infrastructure.
    - 6.2.2. Multi-unit residential and commercial buildings would qualify for the tax credit or rebate only for the installation of non-proprietary charging infrastructure.
7. Support federal funding or other incentives for zero-emission vehicle charging and fueling infrastructure corridors.
  - 7.1. Establish a grant program to support state and local governments' efforts with infrastructure providers to invest in electric vehicle charging and hydrogen fueling infrastructure along designated alternative fuel corridors.
  - 7.2. Provide eligibility under the Surface Transportation Block Grant Program (STBGP), National Highway Performance Program (NHPP), and National Highway Freight Program (NHFP) for electric vehicle charging and alternative fueling infrastructure.
    - 7.2.1. Amend 23 U.S.C. §133(b), §119(d), § 167 – to make eligible a project or program to establish electric vehicle charging or natural gas or hydrogen vehicle refueling infrastructure for the use of battery powered or natural gas or hydrogen fueled trucks or other motor vehicles at any location in the state (giving priority to corridors designated under section 151) where such establishments are permitted.
8. Support federal funding or other incentives for multi-state zero-emission vehicle charging and fueling infrastructure corridors.

- 8.1. Support a federal grant program which provides funding for multi-state efforts to deploy electric vehicle charging and hydrogen fueling infrastructure.
  - 8.1.1. Support a set-aside for freight-specific ZEV corridors – charging and fueling infrastructure in these freight-specific corridors should reflect the unique charging and fueling requirements of freight vehicles, allowing trucks to reserve charging and fueling opportunities to limit charging and fueling wait-time.

## Workforce Development

### Introduction

Deploying ZEVs and associated charging and fueling infrastructure will require significant investment in the public and private workforce needed to build and maintain these vehicles and associated infrastructure. ITS America supports providing federal funding and investment to study and identify workforce development needs and support workforce development programs for the deployment, maintenance, and operation of ZEVs and infrastructure, including for public transportation.

### Policy Recommendations

9. Support federal investment in public and private workforce development programs to ensure a sufficient labor force to deploy and maintain an appropriate ZEV charging and fueling network.
  - 9.1. Support funding for USDOT to study and identify workforce development needs to ensure an adequate workforce to deploy and maintain a ZEV charging and fueling infrastructure network.
  - 9.2. Support funding for USDOT workforce development programs aimed at providing public sector and private sector employees with the necessary skills to deploy and maintain a ZEV charging and fueling infrastructure network.
10. Support federal investment in public and private workforce development programs to ensure a sufficient labor force for ZEV maintenance and operation.
  - 10.1. Support funding for USDOT to study and identify workforce development needs to ensure an adequate workforce for ZEV maintenance and operation.
  - 10.2. Support funding for USDOT workforce development programs aimed at providing public sector and private sector employees with the necessary skills to maintain and operate ZEVs.
11. Support federal funding for transit workforce development, primarily in financial incentives distributed by USDOT, for training new workers in zero-emission transit vehicle maintenance and operation.



## Electric Grid Sustainability and Resiliency

### Introduction

A large-scale deployment of ZEVs will require significant investment to improve the generation capacity, sustainability, and resiliency of the nation's electric grid and increased collaboration between the transportation and energy sectors. ITS America supports federal funding to develop grid infrastructure, improve the physical and digital security of the grid, conduct research into increasing grid capacity, develop vehicle-to-grid technology and pilot programs, and increase communication and coordination between the transportation and energy industries.

### Policy Recommendations

12. Support federal funding for utility providers to develop grid infrastructure on public and/or private property. For instance, by constructing additional substations and/or transmission infrastructure to support intelligent transportation systems and broadband infrastructure; the charging needs of electric public transportation vehicles, state or local government electric vehicle fleets, electric vehicles used by the general public; and to strengthen and add redundancy to the national electric grid.
13. Support increased federal funding for measures to improve the physical and digital security of the United States' electrical grid, including cybersecurity training programs for the grid workforce.
14. Support increased federal funding for research related to increasing grid capacity in anticipation of the increased adoption of electric vehicles.
15. Provide federal funding for vehicle-to-grid (V2G) research and pilots, consider an incentive program to encourage medium- and heavy-duty vehicles to work with utilities to provide power to grids during downtime.
  - 15.1. Support increased federal funding for pilot projects aimed at developing best practices for agencies planning on deploying V2G technologies.
  - 15.2. Support dedicated funding for school buses or city municipal fleets for the purchase and deployment of V2G technology.
16. Support efforts to increase communication between transportation stakeholders and utilities to promote coordination between both sectors in the deployment of electric vehicles and associated charging infrastructure.

## Research and Development

### Introduction

While we have made many advancements in sustainable and resilient transportation, much more research and development is needed to continue to develop ZEV, charging, and fueling technologies. ITS America supports federal assistance for continued research into EVs and battery technologies, alternative fuels technologies, and efficient mobility systems to decrease costs, increase range, improve safety, enhance efficiency, promote interoperability, and reduce the life-cycle environmental impacts of these technologies.

### Policy Recommendations

17. Support federal assistance for continued research and development for zero-emission vehicles and associated battery, charging, and fueling technologies and other sustainable mobility systems.
  - 17.1. Electric Vehicles and Battery Technologies
    - 17.1.1. Support continued research on battery technologies that can decrease overall cost per/kWh, improve battery chemistry to increase battery range, and improve battery safety.
    - 17.1.2. Support research and development that increases the speed and effectiveness of vehicle charging and recharging options for EVs.
    - 17.1.3. Support research and policies that promote interoperability for electric vehicle charging systems.
    - 17.1.4. Support research related to EV battery reuse and recycling.
    - 17.1.5. Support research related to EV battery life-cycle environmental impacts.
    - 17.1.6. Support research related to public transportation ZEVs.
    - 17.1.7. Support research related to the domestic manufacturing of ZEVs and related technology.
  - 17.2. Alternative Fuels Technologies
    - 17.2.1. Support fuel cell research, development, and deployment for use in the transportation sector.
    - 17.2.2. Support research and development of technology that will generate hydrogen fuel from renewable sources.
    - 17.2.3. Support research and development of biofuels that reduce emissions and can be created from renewable resources.
  - 17.3. Efficient mobility systems
    - 17.3.1. Support research and development that increases the efficiency of the US transportation system, including reducing travel times, congestion, and fuel usage.

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