



STATE OF MAINE
DEPARTMENT OF TRANSPORTATION
16 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0016

Janet T. Mills
GOVERNOR

Bruce A. Van Note
COMMISSIONER

January 14, 2022

Submitted electronically to the docket

Stephanie Pollack
Deputy Administrator
Federal Highway Administration

Re: *MaineDOT comments on docket FHWA-2021-0022*

Dear Deputy Administrator Pollack:

Thank you for the opportunity to provide comments on the Bipartisan Infrastructure Law's (BIL) Electric Charging Infrastructure program. The State of Maine is excited to work in this area. The funds provided by the BIL will help promote electronic vehicle (EV) charging at a much faster pace than we've been able to do to date. Maine established a Climate Council in 2019 and produced a climate action plan titled Maine Won't Wait. One of the key strategies in the plan is to electrify the transportation system. This includes Light Duty Vehicles (LDV), Medium & Heavy Duty Vehicles, School Buses, Transit vehicles and other modes of transportation. As instructed in the Maine Won't Wait report, Maine recently released its Clean Transportation Roadmap with specific strategies to meet its climate goals. A key part of achieving this roadmap includes public charging for light duty vehicles and a plan to support charging for other classes of vehicles. Maine used the maximum allowable amount of its federal VW settlement money to support LDV public charging and allocated most of its state VW settlement money to start a rebate program for EVs. We have also analyzed charging gaps in rural and disadvantaged areas of the state and plan to build charging stations in those areas starting this year. Maine is committed to providing electric charging access throughout our large, rural State to meet our ambitious climate and equity goals.

Maine has put significant time and effort into developing our public EV charging network. We encourage you to provide flexibility to States like Maine to address the specific standards and strategies we have been employing. To that end, we urge the following:

1. waiving or extending, on a case-by-case basis, the minimum distance between stations on Alternative Fuel Corridors to account for increasing battery ranges and the challenges of finding suitable sites in rural states;
2. allocating funds between DC Fast Chargers and Level 2 chargers;
3. setting minimum charger power levels and minimum numbers of chargers (or ports) per location, and networking requirements in rural areas and

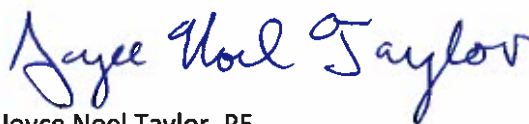
4. expanding the definition of “publicly available” to include multi-unit dwellings that serve low-income citizens.

For States that have been administering programs to develop EV charging networks for several years now, there is a benefit to allowing some continuity to the criteria and strategies already in place. We need flexibility. States should have an EV Charging Plan and one that includes equity and inclusion needs.

Also, we’re concerned about Buy America requirements, which could drastically reduce the supply of chargers available, especially with so many new funds available. Many of the companies that produce charging equipment are not familiar with federal requirements like Buy America. We recommend a transition period before requiring Buy America.

Finally, we encourage expeditious disbursement of these funds to the States in order to support our climate goals, stimulate economic development, and develop the transportation infrastructure of the future.

Sincerely,

A handwritten signature in blue ink that reads "Joyce Noel Taylor". The signature is written in a cursive, flowing style.

Joyce Noel Taylor, PE
Chief Engineer