



April 20, 2023

The Honorable Rick Chavez Zbur
Member, California State Assembly
1021 O Street, Suite 4350
Sacramento, CA 95814

RE: AB 1176 (Zbur): Local Electrification Planning Act.
Notice of Oppose Unless Amended *(As amended March 23, 2023)*

Dear Assembly Member Zbur:

The League of California Cities (Cal Cities) and the California Building Industry Association (CBIA) regrettably must write in opposition to your measure, AB 1176, unless it is amended to address our concerns. AB 1176 would require all cities and counties to either adopt a climate action electrification element as part of the general plan or otherwise amend the general plan to identify strategies and enforceable commitments to meet California's greenhouse gas reduction goals requiring increased electrification of transportation and buildings.

While we support the state's climate and transportation goals, local jurisdictions are aggressively doing their part to comply with existing state mandates to deploy a robust electric vehicle charging station network. Unfortunately, AB 1176 is predicated on the false premise that local jurisdictions universally have energy reliability and will easily be able to add capacity to meet electrification requirements.

Opening a general plan or adopting new revisions to one for electrification to support transportation needs is not appropriate and would be better suited in the circulation element. Currently, we are working with several legislators on other similar measures, including Assembly Bill 1504 (McCarty), which would require local governments to plan for the installation of EV charging stations in the public right-of-way. Cities and counties must do several things in developing the plan and permitting process, such as consulting with internal and external stakeholders, developing a process to solicit input from the public, assessing the jurisdiction's existing EV charging stations and its projected need for EV charging stations in the right-of-way, and identifying planning and permitting barriers to the installation of EV charging stations in the right-of-way. Cities and counties must also identify competing uses in the right-of-way and complete an equity analysis to determine locations for EV charging stations in the right-of-way that will reduce barriers to equitable access.

Specifically, this measure requires the collaboration and consultation with energy providers, as well as relevant building and planning departments to complete an assessment of existing and projected electrification needs, which is something local

jurisdictions support. Further, this measure would require the development of a location, zoning, or siting framework that considers and identifies, at a minimum, the density of the surrounding development and the types of transportation corridors that are required for the installation of EV charging stations in the public right-of-way, as well as identify necessary updates to relevant codes or regulations of the local agency. While AB 1504 is not ideal and presents significant implementation issues for local governments this approach is less problematic than what is proposed in AB 1176.

While a few local governments are served by municipal electric providers (SMUD, LA DWP, Glendale, Burbank, etc), most are served by investor-owned utilities. Having local governments prepare electrification elements without having any control over the grid and system upgrades will set locals up for failure. Local governments do not control the means with which to deploy vehicle charging stations in our communities. We do not own or operate those stations, nor do some locals have the capacity to do so.

For these reasons, Cal Cities and the California Building Industry Association respectfully opposes AB 1176 unless it is amended to address our concerns. If you have any questions, please do not hesitate to contact me at (916) 658-8264.

Sincerely,



Damon Conklin
Legislative Affairs, Lobbyist
League of California Cities



Cornelious Burke
Vice President of Legislative Affairs
California Building Industry Association



Tracy Rhine
Policy Advocate
Rural County Representatives of California

Cc: Members, Assembly Committee on Local Government
Angela Mapp, Chief Consultant, Assembly Committee on Local Government
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