Illinois Electric Vehicle Deployment Plan
Public Comment Summary (July 15 - August 30)

IDOT committed to ongoing stakeholder engagement as part of NEVI plan submitted to FHWA. As one aspect of this commitment, IDOT is publishing periodic updates about stakeholder feedback and public engagement that is informing NEVI implementation. This document summarizes stakeholder and public feedback on the NEVI program received by IDOT between July 15th and August 30th.

Stakeholders have been providing suggestions for charging locations via the map tool and survey on the drive electric website and by email. Some general themes that have emerged from stakeholder location suggestions so far include a desire to site stations in areas with existing commercial activity, both for user convenience and comfort while waiting for vehicles to charge and to support local economic development strategies. IDOT will continue to compile this information throughout the remainder of the calendar year to inform site prioritization as part of procurement processes anticipated to begin in calendar year 2023.

On July 28, IDOT held a public meeting about the NEVI program, providing background on the NEVI program and the Electric Vehicle Deployment Plan process, answered questions from attendees, and collected responses to survey questions. A recording of that meeting is available on the IDOT website.

IDOT has received comments from a range of stakeholders, including EVSE providers, auto manufacturers, fleet operators, and environmental advocates about appropriate strategies for supporting future medium and heavy-duty freight electrification. There is general agreement that it is important for the NEVI program to consider opportunities to support medium and heavy-duty electrification through higher site power availability, availability of high power chargers, and site design that accommodates medium and heavy-duty vehicles without blocking other charging ports, particularly along routes with high truck traffic. Stakeholders have also expressed concerns that language in the draft plan, which states that Illinois plans to require every site to accommodate medium and heavy-duty traffic would significantly limit the number of viable sites for public charging stations and increase costs to an extent that might make charging installation infeasible in some areas of the state. It has always been IDOT’s intent to set the NEVI program up for success and to adjust the state’s approach to the program in response to stakeholder input. As a result of the input we have received, IDOT will consider taking a more site/corridor specific approach to medium and heavy-duty installation. Some potential strategies to accomplish that include strongly encouraging accommodation for these vehicles and particularly prioritizing medium and heavy-duty infrastructure on freight corridors and where freight electrification provides benefits for disadvantaged communities.

IDOT received feedback from labor unions related to licensing and certification requirements for workers and contractors involved in EV charger installation, operations, and maintenance. IDOT is awaiting further guidance from the federal government in the form of the final rulemaking on the NEVI program, including direction on issues of certification requirements and apprenticeship programs. In the meantime, IDOT will continue working with Illinois EPA, DCEO, labor unions, and other workforce development organizations to ensure that a sufficient, well-trained, and diverse workforce is ready to work on all aspects of electric vehicle charging infrastructure.

IDOT received comments from several stakeholders highlighting the importance of prioritizing disadvantaged communities for EV charging infrastructure and the importance of engaging members of disadvantaged communities as NEVI implementation moves forward. IDOT agrees this is an important
priority and is seeking to partner with organizations led by and representing disadvantaged communities to plan meaningful engagement opportunities as part of continued public and stakeholder engagement.

IDOT has received a number of other comments from stakeholders on a range of subjects, including:

- Support for and interest in the NEVI program
- Requests for links to webinar recordings, the draft plan as submitted to FHWA, and the IDOT NEVI website
- Questions and comments about EV programs administered by other Illinois agencies or the federal government (such as EV purchase incentives, federal rebates)
- Opposition to public funding of statewide charging stations
- Suggestions for future Alternative Fuel Corridor designations
- Concern about the impact of future proofing requirements on site availability
- Encouraging consideration of on-site renewable generation as part of site selection
- Support for eligibility of not-for-profits as site hosts
- Support for maintenance requirements and encouraging planning to address longer-term maintenance issues beyond the current 5-year NEVI program timeline.

IDOT is keeping track of the comments received for consideration as the implementation process moves forward and directing questions and comments to other agencies as appropriate. All materials related to the NEVI program are posted on the IDOT website at https://idot.illinois.gov/home/drive-electric-illinois. IDOT intends to continue to provide periodic summaries of stakeholder and public comment throughout the NEVI implementation process.