



Dear Administrator Regan:

- Ion. Leirion Gaylor Baird, Chair
incoln, NE
- Ion. Lucy Vinis, Vice-Chair Eugene, OR
- Ion. Ras Baraka Newark, NJ
- Ion. Luke Bronin Hartford, CT
- Ion. Sharon Broome Baton Rouge, LA
- Mr. Gary Brown Detroit, MI
- Ms. Darcy Burke Elsinore Valley, CA
- Ion. Jose C. Aponte Dalmou Carolina, PR
- Ion. Kimberly duBuclet Cook County, IL
- Ms. Miki Esposito Los Angeles County, CA
- Ion. Sarah Fox Vancouver, WA
- Ion. Jacob Frey Minneapolis, MN
- Ion. Katherine Gilmore Richardson
Philadelphia, PA
- Ion. Nick Gradisar Pueblo, CO
- Ion. Jonathan Grieder Waterloo, IA
- Ion. Evan Hansen Morgantown, WV
- Ion. Brenda Howerton Durham, NC
- Ion. Deana Holiday Ingraham East Point, GA
- Ion. Ella Jones Ferguson, MO
- Ion. Heather Kimball Hawai'i County, HI
- Ion. Christine Lowery Cibola County, NM
- Ion. Ann Mallek Albemarle County, VA
- Ion. Rachel May Syracuse, NY
- Ion. Christian Menefee Harris County, TX
- Ion. Douglas Nicholls Yuma, AZ
- Ion. Ron Nirenberg, San Antonio, TX
- Ion. Neil O'Leary Waterbury, CT
- Ion. David Painter Clermont County, OH
- Ion. Mary Lou Pauly Issaquah, WA
- Mr. Whitford Remer Tampa, FL
- Ion. Satya Rhodes-Conway Madison, WI
- Mr. Michael T. Scuse State of Delaware
- Mr. Jeff Witte State of New Mexico
- Ms. Lisa Wong South Hadley, MA

Maige Lieberman, Designated Federal Officer, PA

- Ms. Christine Lowery, County Commissioner, Cibola County, NM
- Ms. Ann Mallek, Supervisor, Albemarle County, VA
- Mr. Julian McTizic, Mayor, Bolivar, TN
- Mr. Tom Carroll, City Manager, Cambridge, MD
- Ms. Velma Jenkins, Mayor, Shuqalok, MS
- Mr. Jose Carlos Aponte Dalmou, Mayor, Carolina, Puerto Rico
- Ms. Hattie Portis-Jones, Councilmember, Fairburn, GA
- Mr. James Perkins, Mayor, Selma, AL
- Mr. Jonathan Godes, Mayor, Glenwood Springs, CO
- Mr. Vincent DeSantis, Mayor, Gloversville, NY
- Mr. Dave Glatt, Director, Department of Environmental Quality, Bismarck, ND
- Mr. Daniel Guzman, Councilmember, Oneida Nation, WI
- Mr. Rey Leon, Mayor, Huron, CA
- Ms. Michele Zolezi, Township Vice President, Manchester, NJ
- Ms. Sophie Swope, Councilmember, Bethel, AK
- Ms. Ella Jones, Mayor, Ferguson, MO
- Ms. Kimberly Rich, Alderman and Mayor Pro Tem, Willow Springs, MO
- Mr. Kevin Dumas, Town Manager, Mansfield, MA
- Ms. Denise Koch, Deputy Director of Engineering and Public Works, Juneau, AK
- Mr. Tyler Palmer, Deputy City Supervisor, Moscow, ID
- Mr. Kevin Shropshire, Pretreatment Coordinator, Rockledge, FL
- Mr. Greg Puckett, County Commissioner, Mercer County, WV

Maige Lieberman, Designated Federal Officer, EPA

On behalf of the Local Government Advisory Committee (LGAC) and the Small Community Advisory Subcommittee (SCAS), we are delighted to offer a letter to EPA as the Biden-Harris Administration works to lower transportation emissions and consumer costs in smaller communities. The LGAC and SCAS appreciates federal commitments from EPA, the departments of Energy, Transportation, and Housing and Urban Development to accelerate the nation's affordable and equitable clean transportation future and we are honored to provide recommendations to EPA directly as federal agencies implement the interagency framework under the U.S. National Blueprint for Transportation Decarbonization.

Within this letter, the SCAS addresses EPA's charge by providing insights to a set of challenges and barriers that small towns face while transitioning towards an affordable and equitable transportation future and offers solutions to the various challenges. Overall, the SCAS recommends:

- EPA to work with states and regions to implement programs that incentivize clean and renewable energy for small communities and set long term goals to improve services for people to be able to use electrified public transportation.
- EPA and the Department of Transportation (DOT) help facilitate discussions with states and local governments to improve the sustainability of the U.S. grid as the nation seeks to expand the use of electric vehicles regionally.
- To develop a program that provides support to smaller communities to enhance their capacity to apply for federal grants, which will ultimately make newly established programs more accessible for all American communities.
- To incentivize states to deploy federal funding for grant navigators. Grant navigators can be deployed directly to smaller communities to help city officials to identify applicable grant funding based on local priorities.

It is our hope that the details in this letter will inform EPA and other federal agencies on ways to advance smaller communities efforts to provide clean, convenient, and affordable transportation options around the country.

Sincerely

Leirion Gaylor Baird

Leirion Gaylor Baird
Mayor
LGAC Chair

Christine Lowery

Christine Lowery
Commissioner
SCAS Co-Chair

Ann H Mallek

Ann Mallek
Supervisor
SCAS Co-Chair

Recommendations from EPA's Small Community Advisory Subcommittee (SCAS)

In March 2023, the Local Government Advisory Committee (LGAC) Small Community Advisory Subcommittee (SCAS) was charged to advise the Environmental Protection Agency (EPA) to help inform the Office of Community Revitalization in their work with small communities, with a particular focus on land use and transportation matters. Subcommittee input illuminates the needs of smaller communities that should be understood so that EPA can most effectively support the deployment of clean, convenient, and affordable transportation options for residents and businesses. SCAS summarized how smaller towns contend with a unique set of challenges as the nation works to build a more affordable, equitable, and green transportation system and offered potential solutions to address those barriers. Recognizing that the SCAS represents localities with population sizes from as few as 300 residents to as many as 30,000 residents, the Subcommittee collectively urges the federal government and partners in state governments to provide financial assistance to strengthen the capacity of small communities throughout America to improve and protect the health of their people and the environment in which they live.

SCAS members were asked to identify local challenges associated with the broader national transition to a cleaner transportation system. Members acknowledged various levels of risk associated with the early adoption of electrify vehicles and the testing of newer technologies. Associated risks include expensive upfront costs, ongoing maintenance, and continuous upgrades needed for new technologies. Additionally, many small communities do not have sufficient revenue streams to cover the expensive up-front costs of electrifying public transportation systems and deploying charging infrastructure for residents with electric vehicles.

SCAS members reported that, in their experience, smaller, less densely populated communities, particularly rural, agricultural communities, are slow to adopt electric vehicle technology due to the vast geographic distance between local amenities. In some communities, the closest store may be as far as 10 miles away from homes and schools, and there is a lack of vehicle charging infrastructure in between those destinations. There is a resulting lack of public confidence to purchase electric vehicles in the absence of sufficient, convenient charging infrastructure. Smaller communities not only lack confidence with the infrastructure needed to install charging stations, but they also lack capacity for maintenance required for these stations. Federal and state agencies should provide and align funding streams to support small communities with installation and maintenance of charging infrastructure in order to electrify those transportation systems. Federal officials can also anticipate challenges associated with land use policies that could complicate deployment for individuals, businesses, school districts, and municipalities.

SCAS members shared serious concerns associated with grid capacity and plans for electrification at the municipal level. The U.S. grid is divided into three major regions and each region is interconnected to local electricity grids. As communities examine how to deploy renewable energy alternatives within the transportation sector, including for schools and businesses, small communities are concerned that existing grids cannot support broad efforts to electrify. The SCAS acknowledged that it will take a lot of time for a small community to electrify public transit and the perception that fleet electrification will be overly costly, despite the opportunity to pursue federal funding in support of those efforts.

Smaller communities face barriers in securing public support for municipal energy transition plans because there is a lack of education on the benefits of electrifying vehicles. Some remote communities,

like Bethel, Alaska, have yet to consider electrifying their system because local government operations rely heavily on diesel fuel for transportation due to the condition of minimally paved roads. That town cannot yet consider electric vehicles currently on the market without rethinking its infrastructure more holistically, including its approach to pavement.

Finally, the SCAS was asked to identify gaps in the current set of tools available to small communities navigating how to pursue federal investments in support of cleaner transportation options. SCAS members communicated that the federal grant application process could be intimidating and burdensome for local governments with limited internal capacity. Small communities could face a number of challenges, including the process of identifying appropriate funding streams and aligning eligible activities, writing competitive applications, and managing grants in compliance with applicable federal laws and regulations if selected for awards.

Despite the set of existing challenges to move to cleaner transportation selections for smaller communities throughout the nation, the SCAS offered a number of ideas and recommendations to EPA that can support the overall goal to decarbonize transportation in all communities.

As with larger municipalities, small towns must plan systems that address the needs of a population of residents that do not have access to personal vehicles. This is particularly true for senior citizens, who may rely on transit to access healthcare and government services. Local officials can focus on increasing the availability of community-based transportation and/or incentivizing safe rideshare options rather than promoting the use of electric single-occupant vehicles.

Smaller communities should work in tandem with state, regional, county, or local partners to connect transportation plans and leverage resources, rather than piecemealing the building of a new electric transportation system. **The SCAS recommends that EPA work with states and regions to implement programs that incentivize clean and renewable energy for small communities and set long term goals to improve services for people to be able to use electrified public transportation.**

The SCAS recommends that EPA and the Department of Transportation (DOT) help facilitate discussions with states and local governments to improve the sustainability of the U.S. grid as the nation seeks to expand the use of electric vehicles regionally. The SCAS believes that a whole-of-government approach is needed to help facilitate the transition within smaller communities – one that is considerate of a myriad of critical local factors like housing, workforce, and access to jobs, education, healthcare, commerce, and government services.

Finally, the SCAS recommends the development of a program that provides support to smaller communities to enhance their capacity to apply for federal grants, which will ultimately make newly established programs more accessible for all American communities. Regional technical assistance centers can provide great opportunities to those that can easily access those resources; however, this is not the case for many smaller communities. **Therefore, the SCAS recommends EPA to incentivize states to deploy federal funding for grant navigators. Grant navigators can be deployed directly to smaller communities to help city officials to identify applicable grant funding based on local priorities.** The agency can provide training programs for navigators, who can help smaller communities enhance the technical expertise that is required for grant application and management.

The SCAS thanks EPA for the opportunity to provide insight to their efforts to help smaller communities to support clean, convenient, and affordable transportation options.