



February 1, 2022

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

**Re: Development of Guidance for Electric Vehicle Infrastructure Deployment, Docket No. FHWA–2021–0022**

On behalf of the approximately 50,000 members of ICSC, thank you for the opportunity to comment on the Biden Administration’s efforts to improve U.S. electric vehicle (EV) infrastructure. ICSC and the Marketplaces Industry stand ready to partner on the facilitation of EV charging capabilities. In order to not only meet current demand for electric vehicles but also encourage greater adoption of an EV lifestyle, the federal government should work with retail properties to assure infrastructure is installed where people will use it most.

ICSC is a member organization for the advancement of the Marketplaces Industry in their vital roles as community builders, career developers, job creators and economy drivers. Our members include property owners, developers, financial institutions, professional service providers and, importantly, marketplace tenants such as retailers, restaurants, gyms, child care providers, health care and wellness centers. There are 115,000 marketplaces across the country and these businesses comprise an essential part of every city, town and village, with small businesses representing nearly 70 percent of marketplace tenants.

The Marketplaces Industry is an integral component of American communities, with an estimated \$6.7 trillion of annual consumer activity produced by the retail, food & beverage, entertainment and consumer service industries occurring within America’s marketplaces, and nearly 1 out of 4 American jobs is retail related. Approximately \$400 billion of all state and local taxes supporting schools, public safety resources and infrastructure was generated by our industry in 2019.

The recently enacted Infrastructure Investment and Jobs Act (Public Law 117-58) makes a historic commitment to the deployment of EV charging infrastructure. In addition to substantial formula-based state funding, the law also establishes a discretionary grant program for Charging and Fueling Infrastructure (Charging and Fueling Infrastructure Program) to strategically deploy publicly accessible EV charging infrastructure in certain other locations that are accessible to all drivers of such vehicles. With regard to community grants that prioritize rural areas, low- and moderate-income neighborhoods, and communities with a low ratio of private parking spaces to households or a high ratio of multi-unit dwellings to single family homes, ICSC believes that the Marketplaces Industry has an important role to play in the development process.



Our members have already begun to build-out EV charging infrastructure and have first-hand knowledge of the technology, energy requirements, permitting, and logistics for locating charging units. We look forward to working with you to use that experience and data to address the challenges and take advantage of opportunities in creating public access to EV charging.

In order to meet the expected demand of additional EV vehicles the build-out must increase exponentially and in order to be an effective investment, EV charging must be located where drivers will be able to access it as they live their lives. ICSC believes as more consumers become aware of EV charging opportunities in the marketplaces where they shop, work, eat and play, we can alleviate range anxiety and create a greater comfort level for adopting an EV lifestyle.

While the work to create EV charging opportunities for passenger cars is underway, the recharging needs for heavy-duty and light-duty trucks remains in the nascent stages as fleet and infrastructure costs are considerable. In order for supply chain and delivery vehicles to make the shift to electrification, EV and other carbon neutral charging infrastructure will need to be developed. We support consideration in this important area as the deployment of federal EV charging infrastructure funds occurs.

ICSC and the Marketplaces Industry look forward to working with the Department of Transportation, the Federal Highway Administration, the Department of Energy and our partners in state and local government. Together we can be part of the solution for building out American's EV charging infrastructure and addressing the global challenge of climate change.

If you have any questions or would like additional information, please contact Jennifer Platt, Vice President of Federal Operations, [jplatt@icsc.com](mailto:jplatt@icsc.com) or 202-626-1404.

Sincerely,

**Betsy Laird**

Senior Vice President, Global Public Policy  
ICSC Office of Global Public Policy

1201 Pennsylvania Avenue, NW, Suite 210  
Washington, DC 20004

**ICSC.com**