



California Fuels and Convenience Alliance

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**Fairfax City Council
142 Bolinas Rd.
Fairfax, California 94930**

Re: Agenda Item #14 - GAS STATIONS

To: Mayor Chance Cutrano

Vice Mayor Barbara Coler

Council Member Lisel Blash

Council Member Bruce Ackerman

Council Member Stephanie Hellman

The California Fuels and Convenience Alliance (CFCA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and more than one half of the state's 12,000 convenience retailers. Our members are small, family- and minority-owned businesses that provide services to nearly every family in California. Additionally, CFCA members fuel local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among many others. CFCA appreciates the opportunity to provide comment on this proposed moratorium.

The California Fuels and Convenience Alliance strongly opposes the proposal for a prohibition on the construction of new gas stations and the expansion of existing gas stations. This proposal will stifle electric vehicle (EV) charging infrastructure growth in Fairfax and defies California's efforts to fight climate change.

EV Charging and Alternative Fuels Infrastructure

Despite the growth of EVs both in California and nationally, EV charging infrastructure remains very expensive and will require funding from traditional fueling infrastructure until a vast majority of vehicles are not Internal Combustion Engine (ICE) vehicles. This scenario remains decades away as EVs only account for 2.799% of California's total light-duty vehicle population as of December 2021 according to the California Energy Commission.¹ The state and federal governments have recognized this reality and plan to expand alternative fueling networks by utilizing existing and potential new gas station sites, including hydrogen and CNG. Banning access to low carbon liquid fuels like renewable diesel, biodiesel, ethanol, and cleaner burning formulations of gasoline under development hamper California's efforts to combat climate change in the near future.

Fairness and Equity

Some might claim that consumers could charge their EVs at home rather than allowing chargers at gas stations; however, this does not constitute a legitimate path to closing the EV charging gap. More than half of Californians live in multi-family dwellings, which have not been required to be built with EV chargers until recently and will need to be served by EV charging at other sources such as gas stations. As noted above, traditional fueling infrastructure pays for investments in EV infrastructure. Due to nearly nonexistent return-on-investment at this time, stations cannot install EV infrastructure without traditional fuel.

Additionally, the prohibition on new gas stations would hurt Fairfax's future infrastructure needs as mandated by the state through SB 8 and SB 9. These bills, passed to combat California's housing crisis, would require Fairfax to build more

¹ <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle>

housing or face millions of dollars in fines. The estimated housing unit growth mandated by these bills will increase the need for traditional fueling sites beyond 2035 and more points of access for alternative fueling infrastructure.

Conclusion

CFCA urges the Fairfax City Council to cooperate with state and federal programs to allow gas stations within the jurisdiction. Closing the EV charger gap and transitioning to a low or no carbon future is an “all hands-on deck” task that will require both public and private sector participation. Fairfax and other local governments should not be making decisions that impede state and federal initiatives to grow EV charging and alternative fuel networks at gas stations.

Please contact Alessandra Magnasco, CFCA’s Governmental Affairs and Regulatory Director, by email or phone with any questions or comments, at alessandra@cfca.energy and (916) 646-5999.

Sincerely,

A handwritten signature in black ink, appearing to read "Alessandra Magnasco". The signature is fluid and cursive, with the first name being more prominent.

Alessandra Magnasco
Governmental Affairs and Regulatory Director
California Fuels and Convenience Alliance