

DOCKETED

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**MCOG Comments - SB 1000 Electric Vehicle Charging
Infrastructure Deployment Assessment**

Letter attached.

Additional submitted attachment is included below.



MENDOCINO COUNCIL OF GOVERNMENTS

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July 22, 2021

California Energy Commission
1516 Ninth Street
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Re: Docket 20-TRAN-02 - SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment

We appreciate the CEC's focus this year on Equity for the Clean Transportation Program, with rural areas and drive times as a basis for grantmaking in 2021 to 2023. We understand the SB 1000 (enacted in 2018) report informs these new investments. However, we object to the use of CalEnviroScreen, as it conflicts with the intent of SB 1000 to increase access to electric vehicle infrastructure in all California communities.

The reliance on CalEnviroScreen to identify communities as disadvantaged has long excluded the North Coast region and its neighbors from eligibility for many State grant programs. That model is weighted heavily toward criteria pollutants and finds that Mendocino County's air is too clean to qualify using this criterion. Often our communities have been vigilant in preventing pollution in the first place. The CalEnviroScreen model further disadvantages already disadvantaged rural communities in the North State by excluding them from grant funding.

This year, Mendocino Council of Governments (MCOG), as the Regional Transportation Planning Agency, was awarded a Caltrans Sustainable Transportation planning grant, using AB 1550's expanded definition of disadvantaged communities in our countywide region. (AB 1550, Gomez, Greenhouse gases: investment plan: disadvantaged communities; signed into law September 14, 2016.)

According to 2019 American Community Survey five-year estimates, the median household incomes for the five locations in our rural mobility study range from 50.9% to 78.9% of the statewide average (\$75,235). These percentages are below the AB 1550 definition that defines low-income households as at or below 80% of the statewide median income and qualifies them as disadvantaged communities. Tribal census tracts are even lower (Hopland Band of Pomo Indians - 36% of statewide average; Cahto Tribe of Laytonville - 51.5%; Round Valley Tribe - 50.2%).

California Energy Commission

July 22, 2021

Page 2

MCOG has been a leader in planning and supporting the development of Zero Emission Vehicle (ZEV) infrastructure for 25 years, since 1996. Our most recent ZEV Regional Readiness Plan update of 2019 identifies the current demand and proposed locations for electric vehicle charging stations. CEC grants have already funded an initial public network of Level 2 stations in Mendocino County and the first public DC fast chargers on our US-101 corridor. We believe this is just a start and more investment should be directed to our region from the Clean Transportation Program.

Please consider allowing AB 1550's expanded definition of disadvantaged communities for eligibility in your upcoming solicitation. Thanks very much for your consideration.

Sincerely,

/s/

Janet M. Orth

Deputy Director & CFO