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Filer:	Michael Gordon Woodman
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North State Super Region

1255 East Street, Suite 202, Redding, CA 96001
(530) 265-3202 nssr16@gmail.com
www.superregion.org
Mike Woodman, Chair

Jon Clark
Butte County Assn. of Governments

Scott Lanphier
Colusa County Transportation Comm.

Tamera Leighton
Del Norte Local Transportation Comm.

Cole Grube
Glenn County Transportation Comm.

Beth Burks
Humboldt Co Assn of Governments

Lisa Davey-Bates
Lake Co City/Area Planning Comm.

John Clerici
Lassen County Transportation Comm.

Nephele Barrett
Mendocino County Council of Govts

Debbie Pedersen
Modoc County Transportation Comm.

Mike Woodman
Nevada County Transportation Comm.

Daniel S. Little
Shasta County SRTA/MPO

Tim Beals
Sierra County Transportation Comm.

Jeff Schwein
Siskiyou County Local Trans. Comm.

Jessica Riske-Gomez
Tehama County Transportation Comm.

Richard Tippet
Trinity County Transportation Comm.

John Mannle
Plumas County Transportation Comm.

September 30, 2021

California Energy Commission
1516 9th Street, Sacramento, CA 95814
Sacramento, CA 95814

Subject: Docket 21-ALT-01-DRAFT

The North State Super Region (NSSR), formalized through a memorandum of agreement on October 20, 2010, represents a partnership between the sixteen northern California Regional Transportation Planning Agencies and Metropolitan Planning Organizations, to provide a unified voice when addressing state and federal transportation funding and policy decisions and to establish coordination of transportation planning efforts.

The NSSR formed the North State Zero Emission Vehicle (ZEV) Working Group in 2020 with a focus on supporting the deployment of ZEV infrastructure across the Super Region and providing opportunities for collaboration and coordination in seeking grant funding. The NSSR is watching with interest the development of the current Investment Plan Update. We appreciate the emphasis by staff and the Advisory Committee on equity for the Clean Transportation Program.

Rural regions in the North State are economically disadvantaged. North State rural destinations require EV charging infrastructure for interstate commerce to accommodate EV tourism; and investment is critical to ensure these areas of the state are not further economically disadvantaged. Prioritizing investment in EV charging infrastructure in areas recovering from devastating wildfires can help the tourism economy recover in these areas and to “build back better” with modernized energy and transportation infrastructure. Additionally, development of infrastructure for federal fleet electrification would bring needed resources to rural North State counties. The NSSR recommends developing EV charging stations along a far northern east-west corridor, e.g. Eureka – Redding – Susanville – Reno.

The NSSR supports the utilization of AB 1550’s (AB 1550, Gomez, Greenhouse gases: investment plan: disadvantaged communities; signed into law September 14, 2016.) expanded definition of disadvantaged communities to better address equity within the NSSR. The NSSR also welcomes the opportunity to work with the CEC to establish additional metrics in relation to identifying and evaluating rural areas that are disadvantaged, low-income, or impoverished.

The NSSR supports actions to accelerate clean energy projects by directing resources and other actions as authorized by the Governor's emergency proclamation to relieve demand on the electrical grid during extreme weather and wildfires - *dated July 30, 2021*. Consideration should be given to the associated challenges many rural areas face due to Public Safety Power Shutoffs (PSPS) that interrupt electric charging. Infrastructure investment should consider these needs including backup power systems, workforce training, maintenance and technical support, in addition to electric vehicle charging infrastructure and public transit vehicles.

The NSSR through the establishment of the North State ZEV Working Group is focused on being a leader in planning and supporting the development of Zero Emission Vehicle (ZEV) infrastructure throughout the North State. Coordination efforts are underway to identify the current demand, partnerships, and proposed locations for electric vehicle charging stations. CEC grants have already funded an initial public network of Level 2 stations and DC fast chargers in counties within the Super Region and the NSSR looks to continue to build on the progress being made and strongly encourages more investments be directed to our region from the Clean Transportation Program. A virtuous cycle can result from these public investments and business opportunities, renewing North State economies.

The NSSR appreciates the opportunity to comment on the 2021-2022 Investment Plan Update for the CEC's Clean Transportation Program.

Sincerely,

A handwritten signature in brown ink, appearing to read "Mike Woodman", with a long horizontal flourish extending to the right.

Mike Woodman, Executive Director
Nevada County Transportation Commission
Chair, North State Super Region