

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-TRAN-01
<b>Project Title:</b>	Technical Assistance for Clean Transportation Projects
<b>TN #:</b>	255794
<b>Document Title:</b>	Mendocino Council of Governments Comments on ZEV Infrastructure Grant TA Funding
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Mendocino Council of Governments
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/18/2024 4:19:59 PM
<b>Docketed Date:</b>	4/18/2024

*Comment Received From: Mendocino Council of Governments  
Submitted On: 4/18/2024  
Docket Number: 24-TRAN-01*

## **Mendocino COG's Comments on ZEV Infrastructure Grant TA Funding**

*Additional submitted attachment is included below.*



# MENDOCINO COUNCIL OF GOVERNMENTS

525 South Main Street~Ukiah~California~95482  
www.mendocinocog.org

NEPHELE BARRETT, EXECUTIVE DIRECTOR

Administration: Suite B  
(707) 463-1859  
Transportation Planning: Suite G  
(707) 234-3434

April 16, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

RE: Docket 24-TRAN-01, ZEV Infrastructure Grant Application Technical Assistance Funding

Dear Commissioners and Staff:

We are grateful that the CEC is considering providing Technical Assistance (TA) services. Mendocino Council of Governments leads the North State Zero Emission Vehicle (ZEV) Working Group of the 16-county North State Super Region. Since 2021 the group has met and identified barriers and opportunities for rural regions to develop ZEV infrastructure as a necessary transition to a clean energy transportation system and economy. One of the major issues we have encountered as state and federal funding rolls out in the form of grant programs is the general lack of staff capacity within our rural agencies to develop plans, applications, and expertise in this subject matter.

I attended the CEC workshop hosted on March 7, 2024. In the presentation, the public was asked for input on the Technical Assistance (TA) program structure, with anticipated features such as capacity building, application assistance, and implementation assistance.

We would support these services to be included (not limited to) in the solicitation:

- Application and implementation assistance for eligible ZEV projects
- Capacity building to include training and resources where applicants are lacking these
- Guidance on grant program eligibility
- Community-based needs assessments where agencies lack readiness plans or require further detail to qualify for grant funds
- Development of ZEV grant proposals and associated project budgets
- Public health education on ZEV benefits in communities needing more awareness
- Feedback in the form of debriefing on unsuccessful grant applications.

In selecting a TA provider, required and desired qualifications include:

- Expertise in the subject matter, i.e. zero emission vehicles, alternative fuels, renewable energy planning and infrastructure
- Background in planning, grant writing, and public engagement
- Proficiency in budgeting, reporting and project management.

Ways to prioritize TA recipients should include:

- Recipient has not received prior grants directly from the CEC Clean Transportation Program or FHWA National Electric Vehicle Infrastructure (NEVI) programs
- Staff capacity and/or expertise in the subject matter is lacking
- Recipient's jurisdiction includes Justice 40 or AB 1550 disadvantaged communities (DACs)
- Recipient or partner has adopted one or more ZEV regional readiness plans
- Recipient has community support for its proposed projects.

An appropriate level of support would be comprehensive in most DAC cases. Awards of \$200,000 would be reasonable to cover costs for a combination of grant writing and project implementation support for entities that need comprehensive assistance due to scarcity of staff and resources. While we recognize this might reduce the overall number of awards, it might help in leveraging toward larger projects or providing needed flexibility.

And last but not least, many local governments around California benefit from economies of scale, and ZEV projects are no different. One approach is to pool county and city applicants into regional projects, which can utilize one TA provider to cover multiple jurisdictions and cut costs, time, and administrative burdens. If even more flexibility is provided to pool resources together, TA can offer all the more to under-resourced communities.

MCOG greatly appreciates the opportunity to comment on this important TA solicitation. Providing these services will accelerate the ability of rural regions to effectively participate in achieving California's goals for a clean, renewable energy and transportation system for all.

Sincerely,

/s/

Janet M. Orth  
MCOG Deputy Director & CFO  
Moderator, North State Zero Emission Vehicle (ZEV) Working Group