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NSSR Comments on the CTP 2024-2025 Investment Plan Update

Additional submitted attachment is included below.



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October 15, 2024

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Docket 24-ALT-01 2024–2025 Investment Plan Update for the Clean Transportation Program

Dear Commissioners:

We, the 16-County North State Super Region Members, have been monitoring the Clean Transportation Program for the past several years and commend you for the investments made to date. The electrification of transportation is in all of our best interests and is crucial to a clean energy future that mitigates the worst effects of climate impacts, which for the North State Super Region area includes bad air quality, wildfires, flooding, landslides, extreme temperatures, and increased sea levels.

Electric vehicle charging infrastructure is of particular interest and initial investments have been beneficial to the 16-county North State Super Region. While the numbers are gradually increasing, this vast region still has only one percent of public and shared private chargers in California, according to Energy Commission data.

Many of our communities are disadvantaged, and they understand that their economic futures will depend on being prepared for zero-emission transportation in tourism, goods movement, and interstate commerce. Many of us are working hard to bring about these changes.

We see this as an issue of Geographic Equity and ask that the investment program include a strategy to address geographic regions equitably, as has been done with the Rural Electric Vehicle grants and the CALeVIP incentive program.

As we understand it, the Clean Transportation Program Investment Plan outlines key issues and strategies for improving clean transportation infrastructure in rural areas as part of the Clean Transportation Program. It highlights significant challenges faced by rural communities in accessing public fast charging stations, with long travel distances to these facilities and fewer chargers per capita in low-income rural areas compared to wealthier regions. About 88 percent of urban areas are within ten minutes of a public DC fast charger, while only 40 percent of rural areas have similar access. The CEC has claimed it intends to address these disparities through targeted investments

and we urge you to do so by ensuring funding is directed and made available for projects in the 16-county North State Super Region.


To strengthen the plan, our additional recommendations include:

- incentivizing local charging infrastructure development through partnerships and low-cost solutions;
- promoting rural economic development by highlighting economic benefits and supporting local renewable energy projects;
- customizing charging solutions for specific rural needs, including mobile units;
- adding flexibility to siting of locations in rural areas that meet the intent of the program;
- enhancing community engagement and education;
- investing in research and impact assessment;
- ensuring adaptive planning; and
- collaborating with rural utilities.

We believe that addressing Geographic Equity and the needs of the North State can help the State of California and the Energy Commission to achieve your ambitious ZEV goals. It will also help bridge the gap in transportation infrastructure needed to connect the rest of California to the states of Oregon and Washington.

Thank you for considering the needs and contributions of the North State Super Region.

Sincerely,



Sean Tiedgen, AICP, Executive Director
Shasta Regional Transportation Agency (SRTA)
Chair, North State Super Region

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