

DOCKETED	
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Description:	Comments provided from the North State Region regarding Docket 20-TRAN-02
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Organization:	North State Super Region
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North State Super Region

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July 22, 2021

California Energy Commission
1516 9th Street, Sacramento, CA 95814
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Subject: Docket 20-TRAN-02

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) Infrastructure 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. We appreciate the CEC's focus this year on Equity for the Clean Transportation Program, with a focus on rural areas and drive times as a basis for grantmaking in 2021 through 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 NSSR has had experience with other grant programs where projects in severely low-income communities do not qualify for funding because they do not meet the CalEnviroScreen definition of a disadvantaged community. It is critical that projects in low-income communities have equal opportunity for funding as those in "disadvantaged communities" as defined by CalEnviroScreen. While low-income communities in many rural counties have the advantage of cleaner air, they also typically have significantly reduced access to education and employment, making the climb out of poverty even more challenging. Therefore, it is critical that CEC works with rural regions to establish a metric for identifying and evaluating disadvantaged, low-income, or impoverished.

This NSSR recommends the CEC use distance rather than drive time as the primary metric when using mapping to identify any infrastructure gaps. Further, the NSSR supports the utilization of AB 1550's expanded definition of disadvantaged communities to better address equity within the North State Super Region. (AB 1550, Gomez, Greenhouse gases: investment plan: disadvantaged communities; signed into law September 14, 2016.)

The NSSR through the establishment of the North State ZEV Infrastructure 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 in and DC fast chargers in counties within the Super Region and 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.

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

Sincerely,

A handwritten signature in black 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