

DOCKETED

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RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

May 13, 2022

California Energy Commission
ATTN: Hannon Rasool
Deputy Director, Fuels and Transportation Division
715 P Street
Sacramento, CA 95814

**RE: Draft Zero-Emission Vehicle Infrastructure Plan (ZIP),
Docket No. 21-TRAN-03; Publication No. CEC-600-2022-054**

Dear Mr. Rasool,

On behalf of the Rural County Representatives of California (RCRC), we are pleased to offer comments on the *Draft Zero-Emission Vehicle Infrastructure Plan (ZIP)*. RCRC is an association of thirty-nine rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

RCRC is doing its part to strategically position our counties for the future of transportation as well as advocate for safe, reliable and affordable energy, ensuring rural towns can serve the needs of their residents, businesses, and visitors to drive economic recovery and growth. Though significantly under-resourced, many of our counties are working to streamline local permitting processes for electric vehicle (EV) infrastructure, and our organization is working on providing technical assistance and other robust planning efforts to leverage successful projects and private partnerships. One of the biggest unmet needs for rural jurisdictions is the ability to fund EV infrastructure readiness plans. Without these readiness plans including site strategies, most rebates, incentives and/or direct funding programs for charger development are unobtainable by rural jurisdictions.

Rural locales have housing and workforce needs that are different from urbanized settings. Unfortunately, much of the *Draft ZIP* omits the rural perspective and experience, including assurances that the state will direct equitable investments to reach geographically underserved areas. Much of the state's assumptions on EV drivers rely on at-home charging, which is not a panacea for non-urban settings. Rural and remote economies often service an influx of visitors that dwarf their population. Such assumptions would leave out large swaths of rural or rural-destined drivers who may not be able to reach their destination without (fast) public charging opportunities.

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The federal bipartisan Infrastructure Investment and Jobs Act of 2021 (IIJA) specifically called out the importance to meet the infrastructure needs in rural and remote areas. While the funding contained in the IIJA is a drop in the bucket compared to state and ratepayer appropriations, it is the only funding source that recognizes the needs of these hard to serve areas and prioritizes them as such. At present, we estimate that just over 7% of California's public charging stations are located in rural counties¹, which is roughly 60% of California's geography. We urge the *Draft ZIP* to more conscientiously close this gap and ensure greater rural equity.

The *Draft ZIP's* intention to deploy charging opportunities at state facilities is woefully inadequate and must be expanded to incorporate public-facing opportunities at state-owned facilities including fairgrounds, parks, wildlife areas and campgrounds. Fairgrounds, for example, play a major role in the communities where they are located. Beyond the annual county fair event, fair facilities host hundreds of events year-round and are an integral asset to many counties throughout the state, particularly in rural California where they effectively serve as community centers for extreme weather events, emergency operations sites and similar critical community needs. It should also be noted that over the past two decades fairs—the majority of which are state-owned facilities—have been under-invested in and experience a dearth of deferred maintenance.

Lastly, while much of the discussion has been focused on supporting the initial installation of ZEV infrastructure, the *Draft ZIP* fails to discuss long-term strategies on the ongoing operations and maintenance of public EV charging. Stranded assets are a concern in rural communities and destinations where end-user adoption or demand may be slow and intermittent in nature. Rural local governments have finite resources and limited economies of scales. Assurances that stranded assets will not become a local government burden may bolster confidence to support broader public EV charging efforts. Stable funding sources have long presented a challenge with highway or bridge maintenance, and ZEV facilities in more rural and remote areas may not prove sustainable without long-term considerations.

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me at lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

¹ For these purposes, rural counties are defined to include RCRC's 39 member counties, which all have populations under 500,000 but cumulatively represent a population larger than 28 U.S. states.