

DOCKETED

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on Revised Staff Report 2022-2023 Investment Plan Update

Additional submitted attachment is included below.



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

October 25, 2022

California Energy Commission
Docket Unit
Docket No. 22-ALT-01
715 P Street
Sacramento, CA 95814

RE: Comments on Revised Staff Report, 2022-2023 Investment Plan Update for the Clean Transportation Program

Dear Commissioners:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on the 2022-2023 Investment Plan Update for the Clean Transportation Program. RCRC is an association of thirty-nine rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

RCRC appreciates the comprehensive summary of past state and federal clean transportation investments and a synopsis of funds to be allocated (see Table ES-2). We urge the following considerations be reflected in the 2022-2023 Investment Plan Update:

- Rural jurisdictions need funding set-asides and technical assistance to draw down funds, especially for zero emission vehicle (ZEV) infrastructure. As discussed at the October 6, 2022 Advisory Committee meeting, many funding programs are oversubscribed. Such a highly competitive funding process further disadvantages under-resourced jurisdictions.
- More program funds should be directed to hydrogen fueling infrastructure and to medium- and heavy-duty ZEV infrastructure. This is a challenging market segment to convert and does not enjoy a commensurate level of private sector investment as light-duty electric vehicle (EV) charging infrastructure.
- The Investment Plan Update omits key drivers for alternative fuels, such as biomethane production and procurement rationale pursuant to solid waste

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diversion requirements.¹ CalRecycle has estimated that the state's existing infrastructure is inadequate to meet its imposed regulatory requirements for short-lived climate pollutant (SLCP) reductions.² To that end, Clean Transportation Program dollars are well-suited to support zero- and near zero-carbon fuel production and supply. In rural counties that have been impacted by catastrophic wildfires, undergoing forest health improvement projects, and/or have a robust agricultural industry, disposal pathways for managing woody biomass, agricultural waste and wildfire prevention through gasification projects will aid compliance with SLCP reduction efforts.

- Generally, the Investment Plan should better reconcile the needs of the regulated community through greater coordination (and response) to costly regulations imposed by other state agencies, such as the significant infrastructure that will be required through CARB's proposed Advanced Clean Fleets (ACF) rules. Additionally, SB 1383 explicitly requires the state to adopt policies and incentives to increase the sustainable production of renewable biofuels from landfills and other sources in order to help mitigate black carbon emissions and meet the measure's emissions reduction goals. While the proposed ACF regulations conflict with those requirements by not providing a clear path to meeting those mandates long-term, the Clean Transportation Program should balance the multitude of infrastructure needs and options to meet air quality goals.
- Given the findings of the Senate Bill 1000 report³, the 2022-2023 Investment Plan Update does not reveal a strategy that would resolve the geographic inequity of EV charging investments. We urge the CEC to make greater funding commitments for rural inclusion.

Though rural communities have enormous challenges to make such a transformational shift in clean transportation alternatives, we are encouraged by the recognition of rural needs and urge targeted investments to close the pervasive gaps in infrastructure available in rural regions. Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me at lkammerich@rcrcnet.org.

¹ Assembly Bill 939 (Chapter 1095, Statutes of 1989) requires local governments to divert 50% of solid waste from landfills. AB 341 (Chapter 476, Statutes of 2011) established a statewide goal of diverting 75% of solid waste from landfill disposal by 2020. Lastly, CalRecycle's Senate Bill 1383 (Ch. 395, Statutes of 2016) regulations require diversion of 75% of organic waste from landfills by 2025 in order to significantly reduce short-lived climate pollutant (SLCP) emissions.

² CalRecycle, [Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals](#) (2020), pages 9-10.

³ Page 43: "The report found that low-income communities, on average, have fewer public chargers per capita than middle- or high-income communities. It also found that public chargers are unevenly distributed across state and districts and counties but correlated with county populations and plug-in electric vehicles."

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Sincerely,

A handwritten signature in blue ink, reading "Leigh Kammerich". The signature is fluid and cursive, with the first name "Leigh" written in a larger, more prominent script than the last name "Kammerich".

LEIGH KAMMERICH
Policy Advocate