



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

October 6, 2020

The Honorable Gavin Newsom
Governor, State of California
State Capitol, First Floor
Sacramento, CA 95814

RE: Executive Order N-79-20 — Phase-Out of Gasoline-Powered Vehicles by 2035

Dear Governor Newsom:

On behalf of the Rural County Representatives of California (RCRC), I respectfully write to express RCRC's concerns with the implementation of Executive Order N-79-20, which requires the California Air Resources Board to develop regulations to phase out the sale of gasoline-powered vehicles in California by the year 2035. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

RCRC appreciates the state's immediate need to address climate change in light of the increased risks a drier, warmer climate poses when combined with the overgrown conditions caused by generations of mismanagement of California's forested and vegetated lands. RCRC member counties, which contain more than 70 percent of the state's forested lands, have historically suffered the vast majority of the state's catastrophic wildfires, and RCRC has long advocated for federal and state solutions to improve forest health and alleviate the ever-worsening wildfire situation in California. In fact, wildfires themselves present one of the state's largest sources source of carbon emissions, with this year's fires alone estimated to have emitted 30 million tons *more* carbon than the total CO2 emissions that come from powering the entire state *for a year*¹.

RCRC member counties have unique landscapes, communities, and workforce needs that differ wildly from those found in many urban and suburban areas. Rural residents often commute long distances to work in suburban or urban areas, or traverse long distances across their own regions to perform their jobs or obtain necessary goods and services for their families. Commercial operations that rely on medium or heavier duty vehicles such as solid waste or even municipal maintenance work is often done across long distances between communities and individual residences. Rural

¹ Grandoni, Dino; "The Energy 202: California's fires are putting a huge amount of carbon dioxide into the air." *The Washington Post*, September 17, 2020.

communities also have large pockets of low-income residents, with 27 of RCRC's 37 member counties falling under the state's definition of "disadvantaged communities." according to Public Resources Code Section 75005.

Data currently shows that the lowest number of charging stations per capita are in areas with median household incomes between \$50,000 and \$75,000², including RCRC member counties such as Lassen, Merced, Lake, and Modoc Counties. Currently, even the best, most expensive electric vehicles (EVs) have a range of no more than 250 miles — not exactly a practical or feasible vehicle for rural residents who traverse sparse landscapes for work each day, particularly combined with the dearth of charging infrastructure. The relatively low range and lack of charging infrastructure poses very real and life threatening risks, especially for residents in those communities prone to the yearly specter of catastrophic wildfires and who must often evacuate for lengthy periods of time upon very short notice. These factors may also significantly impair mobility of residents in those communities that are subject to frequent and back-to-back multi-day public safety power shut-off events to avoid utility-ignited wildfire.

Furthermore, RCRC has concerns regarding the stability and robustness of the current electrical grid. In 2019, millions of Californians were subject to lengthy power shutoffs to avoid wildfires. In 2020, hundreds of thousands of Californians, most of whom live in rural communities, have experienced similar shutoffs. 2020 also saw the return of rolling blackouts across large parts of the state. The lack of electrical reliability gives many who are left without power great concern about a shift to an all-electric vehicle fleet.

In light of these concerns, RCRC has several outstanding questions regarding the Administration's plans to convert California's vehicle fleet to 100 percent zero emission vehicles, including:

- What is the immediate plan to begin broad deployment of charging infrastructure, including fast charging stations, throughout rural communities that currently lack widespread EV charging opportunities?
- How will the state address the affordability question of EVs for low-income Californians, particularly since many rely on automobiles to commute to work or to perform their job functions?
- How does the state plan to address the differences in rural landscapes and communities, where EVs may not be practical for everyday use, let alone commercial usage?
- As a precursor to electrifying California's private and public vehicle fleets, will the state first ensure the provision of safe, reliability electricity for all Californians? Will the state provide allowances or exemptions for residents in the wildland urban

² Sabalow, Ryan and Rees, Phillip; "It's almost a joke": In rural California, Governor's gas-powered car ban is a stretch." *Sacramento Bee*, September 28, 2020.

interface, who need reliable transportation, and are at greater risk of evacuation or loss of electricity?

- How does the state plan to ensure improvement in battery range and charging speed of EVs to improve their practicality in every application and for every California resident's individual needs?
- How will the state ensure that those vehicles in greatest need of quick refueling capability, especially emergency response vehicles that are often deployed to fight fires in rural areas, can quickly recharge in order to continue fulfilling their critical missions?
- What steps is California taking to require electric vehicle manufacturers to take responsibility for the proper management and recycling of batteries when they are no longer suitable for use in electric vehicles? What is the state's plan for managing the costly disposal of used electric vehicle batteries and who will bear those costs?
- How will California ensure a robust used electric vehicle market when the cost to replace a vehicle's battery may pose significant affordability barriers for prospective purchasers?
- What are the state's estimates of the power generation emissions from an EV-only state vehicle fleet, and how does that compare to the current fossil fuel fleet?
- What are the state's comprehensive plans to address wildfire prevention, forest management and fuels treatment in the interim while we work towards the aggressive goals laid out in your Executive Order?

RCRC looks forward to participating in the continuing dialogue on the implementation of your Executive Order, particularly as it applies to EV usage and charging infrastructure deployment in rural California. Please do not hesitate to contact me at sheaton@rcrcnet.org to discuss our questions and concerns.

Sincerely,



STACI HEATON
Senior Regulatory Affairs Advocate

cc: Members of the RCRC Board of Directors