



February 7, 2025

California Energy Commission
Docket No. 24-TRAN-03
715 P Street
Sacramento, CA 95814

RE: 2024 Draft Zero-Emission Vehicle Infrastructure Plan (ZIP)
Docket No. 24-TRAN-03

To Whom It May Concern,

On behalf of the Rural County Representatives of California (RCRC), I am providing comments on the *2024 Draft Zero-Emission Infrastructure Plan* (Draft ZIP), updated January 8, 2025. RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. Together, these counties comprise over 60% of the state's land mass but account for less than 15% of the state's total population.

First, we commend the Draft ZIP for prioritizing funding scenarios that focus on expanding DC fast-charging networks in rural areas and key commuter destinations. Reliable and accessible fast charging in rural regions is critical to ensuring equitable access to zero-emission transportation. These investments will support rural residents, who often travel greater distances for work, healthcare, and essential services, while also bolstering local economies through increased commerce and meeting the needs of tourists.

We also appreciate the Draft ZIP's recognition of the infrastructure required to enable fleets to meet the state's ambitious Advanced Clean Fleets (ACF) mandates. We strongly agree with prioritizing infrastructure deployment for medium- and heavy-duty vehicles, which are vital to achieving California's air quality and clean transportation goals. It is important to acknowledge that, currently, only state and local government fleets are required to meet the California Air Resources Board (CARB) ACF mandates. However, rural local governments and counties with smaller populations face unique challenges in developing and maintaining the infrastructure needed to support these vehicles. With finite resources, limited economies of scale, and reduced access to

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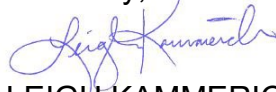
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technical expertise, rural communities are at a disadvantage when competing for funding and therefore executing such large-scale charging infrastructure projects.

To address these inequities, we strongly encourage the Draft ZIP to include targeted technical and financial assistance for rural local governments. Tailored support will empower rural communities to fully participate in California's clean energy transition and ensure equitable outcomes for all regions of the state.

Thank you for considering these comments. We look forward to collaborating with you to ensure that rural communities receive the resources necessary to advance California's zero-emission goals.

Sincerely,



LEIGH KAMMERICH
Policy Advocate