

*Comments of the Center for Sustainable Energy® regarding the
Interregional Transportation Strategic Plan Public Draft*

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Introduction

The Center for Sustainable Energy® (CSE) is pleased to provide these comments regarding the Interregional Transportation Strategic Plan (ITSP) Public Draft. As a mission-driven nonprofit organization, CSE is committed to accelerating the transition to a sustainable world powered by clean energy, including the diversification of transportation technologies focused on air quality improvements and greenhouse gas (GHG) emissions reductions.

CSE Transportation Policy: CSE advocates for all clean transportation and equal access to transportation technologies for all Californians. CSE achieves this by supporting the accelerated adoption of Alternative Fuel Vehicles (AFVs), AFV fueling/charging infrastructure, and related technologies. In addition, CSE supports the expanded use of public transit and active transportation as key methods to support GHG emissions reductions.

Driven by our policy mission, CSE provides the following comments on the ITSP Public Draft.

1) The ITSP should be informed by the current distribution of Zero-Emission Vehicles (ZEVs) in California.

CSE applauds the California Energy Commission (Energy Commission) and Caltrans for working together to identify how both agencies can help support the deployment and use of AFVs within the interregional transportation system¹ and for the integration of the electric vehicle charging station discussion throughout the ITSP draft.² Furthermore, CSE appreciates the inclusion of discussion of the development of the West Coast Green Highway, which from CSE's perspective will be a catalyst to expanded ZEV adoption. Integrating the discussion of the charging infrastructure necessary to power the state's electric vehicles is timely and appropriate, given the state's various initiatives to expand ZEV adoption and the West Coast Green Highway.

Nevertheless, we find that the ITSP falls short of providing details as to the location and adoption patterns of ZEVs, which would strengthen the document's understanding of appropriate quantities of electric vehicle charging stations in various regions and ZEVs' potential proximity to the West Coast Green Highway.

For these reasons, CSE recommends that the ITSP reference two resources to support the understanding of ZEV distribution in the state: 1) the Clean Vehicle Rebate Project (CVRP) rebate

1 Interregional Transportation Strategic Plan Public Draft (ITSP Draft), Page 13.

2 ITSP Draft, Pages 12, 60, 64, 76, 92, 112, and 128.

statistics on ZEVs;³ and 2) the Energy Commission's Statewide Plug-In Electric Vehicle Infrastructure Assessment.⁴ Notably, CVRP rebate statistics can provide a proxy for the locational distribution of ZEVs across the state, and the Statewide Plug-In Electric Vehicle Infrastructure Assessment can provide representation of how vehicle adoption may occur in alignment with the 2020 goals. Integration of this information will help high-level Caltrans policy planning efforts, including the ITSP, and provide additional information in support of the development of the West Coast Green Highway. Therefore, CSE strongly recommends that these informational resources be added to the ITSP.

II) The ITSP should clarify that the California High-Speed Rail (CHSR) Authority prioritizes powering the system using 100% Renewable Energy (RE).

The ITSP indicates that it is informed by the California High-Speed Rail Business Plan, but expanded language in the ITSP could provide a stronger link to the CHSR Authority's environmental policy objectives, which include powering the system with 100% RE.⁵ CSE highly recommends that the ITSP acknowledge the policy framework established by the CHSR Authority in this regard. Fundamentally, RE resources provide energy that is abundant, reliable, sustainable and, with modern technology and controls, flexible, and are thus ideal to power the CHSR and other transportation systems. The CHSR – and other – rail systems could be powered completely by clean energy, which in turn supports larger state goals and RE benchmarks.

Moreover, modification to the ITSP in this regard would align with objectives in the Governor's Office Executive Orders on climate change. As stated in the 2015 ZEV Action Plan, "[t]he CHSR program represents the backbone of the State's transition to electrified transportation. Powered by 100% renewable energy, high speed rail will produce a significant 'mode shift' in transportation that will reduce medium and long-distance car trips and airplane trips. High speed rail also allows Californians to utilize ZEV technology without owning a car."⁶ Therefore, CSE strongly recommends that the ITSP acknowledge the goal of the CHSR system to be powered using 100% RE, which will support the state in achieving its environmental and GHG emissions reductions goals.

³ Center for Sustainable Energy (2015). California Air Resources Board Clean Vehicle Rebate Project, Rebate Statistics. Data last updated May 26, 2015. Retrieved [June 6th, 2015] from <http://energycenter.org/clean-vehicle-rebate-project/rebate-statistics>

⁴ California Energy Commission's Statewide Plug-In Electric Vehicle Infrastructure Assessment. Website Access: <http://www.energy.ca.gov/2014publications/CEC-600-2014-003/CEC-600-2014-003.pdf>

⁵ California High-Speed Rail Policy Directive: Policy Plan-03, 8/19/2013, Page 7. Website Access: http://www.hsr.ca.gov/docs/programs/green_practices/sustainability/Sustainability_signed_policy.pdf

⁶ 2015 ZEV Action Plan, Website Access: http://gov.ca.gov/docs/DRAFT_2015_ZEV_Action_Plan_042415.pdf

Conclusion

CSE appreciates the opportunity to provide these comments on the ITSP. From CSE's perspective, the 2015 edition of the ITSP, with our suggested changes, supports a progressive transportation framework to pursue the accelerated adoption of clean technology in the transportation sector.

Accordingly, CSE recommends that the ITSP should:

- Be informed by the current distribution of ZEVs in California; and
- Clarify that the CHSR Authority prioritizes powering the system using 100% RE.

Overall, CSE stands in strong support of efforts such as the ITSP to diversify clean transportation technologies focused on air quality improvements and GHG emissions reductions. It is only through aggressive, diverse, and accelerated adoption of these technologies across California's modes that our GHG emission reductions targets will be attained and our long-term environmental goals achieved.

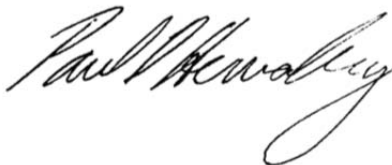
Respectfully Submitted,

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