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**Sierra Club California IEPR Transportation Trends and Light-Duty
ZEV Workshop Comments**

Additional submitted attachment is included below.



July 3, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket No. 20-IEPR-02

RE: Integrated Energy Policy Report Commissioner Workshop on Transportation Trends and Light-Duty Zero-Emission Vehicle Market Update

Dear Commissioners:

Sierra Club California appreciates the opportunity to comment on the California Energy Commission (CEC) Integrated Energy Policy Report (IEPR) 2020 update. Specifically, these comments are regarding the June 11 - 12, 2020 workshops on Transportation Trends and Light-Duty Zero-Emission Vehicle Market Update. These sessions show that California is taking key steps towards zero-emission vehicle adoption.

The transportation sector emits 40 percent of California's total greenhouse gas emissions and mobile sources emit 80 percent of smog-forming NOx emissions. Combating these emissions will require phasing out fossil-fuel-powered cars and adopting zero-emission vehicles. Populations in environmental justice and disadvantaged communities as identified by the CalEnviroScreen have faced disproportionate environmental burdens and should be prioritized for zero-emission vehicle incentives. Further, the state will need a robust, equitable and easy-to-navigate transit and active transportation system to reduce vehicle miles traveled.

I. Zero-Emission Vehicle Market Trends are Strong

BloombergNEF painted an encouraging picture of the steady rise of zero-emission vehicles (ZEVs) in recent years and shared projections that were even more exciting. The market trends show that light-duty ZEV adoption is increasing at a rate that's even faster than expected.

In the last two years, the global passenger electric vehicle fleet has doubled. In the last three years, the number of available models of fully electric vehicles and plug-in hybrids have doubled. The range of electric vehicles has been steadily increasing since the first models were made available in the early 2000s. The number of charging stations has steadily increased in the United States since 2012 and drastically increased globally.

Most astonishingly, Bloomberg NEF projects that small- and medium-sized electric vehicles will achieve price parity with internal combustion engines by 2024 and large electric vehicles will meet this mark as early as 2022.¹

II. California Cannot Waver on Electric Vehicle Investments

While Bloomberg NEF's forecasts demonstrate that we're close to reaching price parity, California still has a lot of work to do. The policies and investments that have gotten the state to this tipping point must continue and ramp up as the decade progresses.

Even as government budgets have been cratered by COVID-19, California must continue to incentivize early adoption of ZEVs through programs like the Clean Vehicle Rebate Program and simultaneously move forward with policies that mandate the phasing out of fossil-fuel vehicles.

Further, California must make significant investments in charging infrastructure and push for policies that make it easier to install charging infrastructure. For instance, requiring charging stations in new buildings and helping cities to improve their permitting processes for installing charging infrastructure.

III. Equitable Transportation Electrification is Essential

Even as ZEV prices drop, the state must recognize that purchasing a new vehicle is untenable for many Californians, particularly those living in underserved areas. Residents living in environmental justice (EJ) and disadvantaged communities disproportionately bear the burden of criteria pollution and would strongly benefit from the public health and environmental advantages of zero-emission vehicles.

As California maps out the future of clean transportation, it must do so in a way that prioritizes EJ and disadvantaged communities. We commend the California Energy Commission for including EJ speakers at every IEPR workshop thus far and we urge the Commission to continue uplifting these voices, strongly considering their recommendations and then implementing them.

IV. California Must Reduce its Vehicle Miles Traveled

California cannot achieve its climate and criteria pollutant reduction goals through ZEV adoption alone. The state must work to implement robust, clean and reliable transit systems throughout the state. Further, the state must work with cities to promote complete streets and orient them towards more active transportation.

¹ Albanese, Nick. *Electric Vehicle Outlook 2020*. June 2020, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=233410&DocumentContentId=65926>. Presentation.

As streets are repaved, they need to also be restripped and otherwise designed to accommodate pedestrians and cyclists. And main corridors should be intentionally redesigned to accommodate bicycle traffic safely. There are many excellent models of complete street design in the U.S. and Europe, especially. Complete streets should be the minimum standard for all street repair and design in California.

Across the United States, cities have closed streets to cars to make urban areas more walkable and to encourage social distancing during COVID-19. Recently, San Francisco closed Market Street to cars for more efficient transit and safer pedestrian travel. The state can encourage cities to think about this solution to reduce car congestion and emissions and ensure safer active transportation.

V. California Must be Prudent With Limited Funding

In response to the pandemic, California has dramatically re-allocated this year's state budget. Thus, the Energy Commission and other agencies will need to be more prudent when awarding clean transportation incentive funding. Fuel cell vehicle advocates have attended the IEPR workshops and urged the Commission to focus more on their technology.

With limited funds, the state must focus on battery electric vehicles and their associated charging infrastructure. Battery electric technology is advancing quickly, especially in the light-duty sector.

To the extent that the state does support limited hydrogen technology, it must do so cautiously and not direct funds to hydrogen that is derived from or created with methane gas, "renewable" or otherwise. Methane is a potent climate-forcing pollutant and supporting it runs counter to California's goals and values.

Again, Sierra Club California appreciates the opportunity to comment on these IEPR workshops and looks forward to engaging with the Commission in future workshops.

Sincerely,



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