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South Bay Cities Council of Governments Perspective on Cap & Trade Funding Guidelines May, 2015

Who We Are & Our Commitment to the Environment

Governance in California is largely through the almost 500 local governments that make many of the land use and transportation decisions that affect greenhouse gas emissions and climate change. Most of the cities are small and therefore working through a council of governments allows them to coordinate their efforts.

In the southwest corner of Los Angeles County, the South Bay Cities Council of Governments (SBCCOG) which is 15 cities plus part of LA City and County – approximately 1 million people - has made a commitment to addressing environmental issues. For over 10 years, we have operated the South Bay Environmental Services Center helping cities, businesses and residents reduce their carbon footprint. We have also spent over 10 years on research and demonstration programs to understand our transportation dynamics.

Partnering with academic and industry experts, we learned how people travel in the South Bay and subsequent studies by LA Metro and others have validated our findings. Our research has included the following:

- Neighborhood Electric Vehicles Demonstration – Monitoring slow speed vehicles used by South Bay residents, funded by the AQMD
- Battery Vehicle Demonstration – Monitoring full speed vehicles used by South Bay residents funded by the AQMD
- Plug In Electric Vehicle Readiness analysis, funded by the CEC and SCAG
- Zero Emission Vehicles in Multi Unit Dwelling Project – funded by CEC in collaboration with the Luskin Center for Innovation at UCLA
- Climate Action Plans including land use and transportation chapters for all of our cities and the subregion, funded by the Strategic Growth Council
- Participation on LA Economic Development Corporation Autonomous Vehicle working group
- Promotion of carsharing with Car2go operating for 1 year in the South Bay
- Design of a slow speed vehicle lane network, funded by LA Metro
- Board adoption of the South Bay Sustainable Strategy

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

How the Current State Funding Guidelines Don't Address Our Area

The South Bay and many mature suburban regions in Southern California are dense but without acceptable levels of transit service including no meaningful rail infrastructure and poor bus service. There is substantial political opposition to adding density since congestion has increased dramatically.

The current Strategic Growth Council funding guidelines reward places with rail infrastructure and some form of arguably good bus transit that are willing to increase density. This one size fits all direction makes it hard for many places to qualify.

High Quality Transit Area Definition - Recommended Modification

Under the current guidelines, priority is given to Transit Oriented Development for areas which are assumed to have robust transit services or "High Quality Transit Areas" (HQTAs), which are defined as transit service that provides 15 minute headways in the peak hour.

15 minute peak headways fail to adequately define a high quality transit corridor. In the South Bay, many of the transit lines that qualify have poor service outside of the peak period (commute window) including zero service on weekends. Also, approximately 70% of travel is not for the journey to work so defining high quality in terms of the peak period has no relationship to the actual mobility needs of residents where the average trip time in the South Bay is seven minutes – too long to walk and too short for transit. Densifying areas that fit the HQTAs definition in the South Bay would only worsen the quality of life and would not lead to the emissions reductions that are required to meet state goals.

The SBCCOG proposes that besides Transit Oriented Development as a focus for cap and trade funding, neighborhood mobility, which represents the majority of trips in communities such as the South Bay, should be included. Zero emissions mobility may be more effectively established through low density redevelopment of commercial strips, migration of commercial strips into compact neighborhood centers at the major intersections and slow speed neighborhood vehicles and low emission private services. We refer to this as Neighborhood Oriented Development.

Two restrictive examples

Two Program Opportunity Notices (PON) using the GHG Reduction Fund have been issued so far. The Affordable Housing Sustainable Communities PON required affordable housing along HQTAs, thereby excluding areas which understand that their transit services will not be adequate to serve the new housing.

The Car/Ride Sharing PON excluded the purchase of slow speed vehicles which are less expensive than full speed and have high utility for the actual needs of many households as was confirmed in the SBCCOG's neighborhood electric vehicle project. By excluding them from the PON, a full range of ride and car sharing mobility options was not allowed to be tested.

Role of Public Health

A priority is being placed on incorporating public health into transportation policy. This has translated into promoting only what is referred to as Active Transportation. If the state wanted to make the largest and fastest impact on public health, they would prioritize the conversion of the vehicle fleet as soon as possible.

Additionally, promoting density around active transportation centers – Transit Oriented Development – is unhealthy because of the amount of polluting vehicles that will be concentrating around the site. For these reasons, the SBCCOG has put its priority on fleet conversion.

Active Transportation Definition

Through multiple studies and demonstration projects in the South Bay, we have found that people drive even as little as ¼ mile to get to their destination. They are not walking or biking. LA Metro has recently released a report which states that in the South Bay, bicycling and walking currently represent approximately 2.6 percent of all commute trips. That has not stopped us from supporting and promoting these healthy lifestyles but it does beg the question of how they relieve congestion and reduce greenhouse gas emissions.

Additionally, our communities are aging – some as dramatically as over 25% of their population over 65 years old. And, we have areas with hills that don't make biking or even walking that easy. For seniors, the SBCCOG believes that neighborhood electric vehicles and other innovative personal mobility devices may be the missing mode for sustainable transportation.

Recommended Modification – Make Streets Really Complete

While better public health is laudable, staking our ability to meet state goals for emissions reductions on something so aspirational is unrealistic. Therefore, the SBCCOG proposes that there should be incentives to create slow speed lanes and networks as part of Complete Streets. The concept of Complete Streets is to ensure that travel rights of way are open to ALL modes. Bike lanes are single mode and don't take advantage of the growing innovations that will come to market for personal mobility. These slow speed options can include: neighborhood electric vehicles, electric bikes, Segways, skateboards, etc.

Complete Streets can incorporate full speed and slow speed lanes and sidewalks for pedestrians. This form of infrastructure would encourage and make it safer to bike and walk and would address first/last mile issues to transit. And, the slow speed lane could be for zero emission conveyances only and be attractive to all age groups.

Bringing the Funding Local

The League of California Cities, SCAG and other agencies are interested in supporting a Community Investment and Innovation program that would be administered on the local level. Such a program would need to establish the flexibility for communities to address their needs as long as they are meeting the state's goals. For example, if an area has robust transit and rail, their needs will be different than areas like the South Bay.

Currently, state agencies are issuing PONs for specific projects or studies with little consultation with local governments. Many local agencies know what they need to reduce emissions and plan for the future. The SBCCOG wants to see any community investment program allow for local areas to identify their needs.

Application Challenges

While the SBCCOG has been encouraged to participate in the process of commenting on State agency Investment Plans, with the Strategic Growth Council, the California Air Resources

Board and the California Energy Commission all soliciting for proposals, a great burden has been placed on agencies such as local cities with small staffs or councils of governments to try to influence the scope of solicitations in advance or to respond with a project. Meetings are in Sacramento and for Southern California, we are advised to ‘attend’ a multitude of webinars.

Additionally, applications require too much time and too many resources to complete. This is especially true for community non-profits representing disadvantaged communities. SBCCOG tried working with such an organization on the car/ride sharing proposal and they could not deal with the complexity of the proposal in the time between notification and proposal due date.

SBCCOG proposes that there be an extended pre-application period so that ideas submitted could affect the funding guidelines and help shape the PON. Also, more attention on workshops throughout the state might provide a more robust set of diverse projects.

Disadvantaged Communities

The South Bay includes several disadvantaged communities. Subsidizing some of the growing private ridesharing and carsharing services might be very cost effective but for projects such as these, the private sector will look for a large area to make their services viable. This should be considered in the guidelines.

Additionally, for electric vehicle charging, SBCCOG studies have found that the wiring in older housing doesn’t automatically support charging at home without modifications. And multi-family dwellings remain a challenge for electric vehicle charging at home. Therefore, incentivizing electric vehicles for disadvantaged communities need to allow for responses to these challenges.

And finally, low cost modes of travel such as neighborhood electric vehicles could greatly help disadvantaged communities. They are not only a first/last mile option but also an excellent inter-neighborhood vehicle. Currently, state rebates are based on the vehicle’s battery size. There should be a greater incentive for those that need a low cost option,

Background Documents

South Bay Sustainable Strategy

http://www.southbaycities.org/sites/default/files/documents/Sustainable%20South%20Bay%20Strategy.09.08.09_0.pdf

Zero Emission Local Use Vehicles: The Neglected Sustainable Transportation Mode

<http://www.southbaycities.org/sites/default/files/LUV%20Report%20%20%20%2007.10.2013.pdf>

South Bay Neighborhoods in 2025: A View from the Front Porch

<http://www.southbaycities.org/sites/default/files/A%20View%20From%20the%20Front%20Porch%20-%20Copy.pdf>