



20285 S. Western Ave., #100
Torrance, CA 90501
(310) 371-7222
sbccog@southbaycities.org
www.southbaycities.org

September 14, 2015

Re: DRAFT CAP AND TRADE AUCTION PROCEEDS TRIENNIAL INVESTMENT PLAN

TO: GGRFProgram@arb.ca.gov

Thank you for the opportunity to provide comments on the Second Investment Plan for the auction proceeds from cap and trade revenues. We do understand that the formal comment period ended on September 1 but unfortunately due to our meeting schedule, we did not authorize approval until now. We hope that you will consider our comments as you deliberate.

The South Bay Cities Council of Governments (SBCCOG) works with our cities to promote sustainability and develop strategies for responding to the challenges posed by the changing climate.

Our most notable initiatives are:

- Operating the South Bay Environmental Services Center, which provides energy efficiency and water conservation information to residents and businesses in the South Bay. Most important is our work to facilitate projects in our cities so that they can lead by example and we have 100% participation of our member cities.
- Implementing a demonstration program over four years with funding from the South Coast Air Quality Management District to have residents in the South Bay drive both neighborhood and full speed electric vehicles during which we monitored their use and provided very promising findings in two reports on our website and distributed to stakeholders.
- Preparing climate action plans for each of our fifteen cities as well as implementation strategies.
- Initiating the Green Building Challenge – a competition among South Bay buildings and businesses to drive measurable sustainability improvements in energy, water, waste and transportation.

Therefore, we read the investment plan with great interest and have the following specific comments on two sections.

Transportation and Sustainable Communities - Pages 8 – 13

After our very successful neighborhood electric vehicle demonstration project and learning that these vehicles were popular for local travel and could easily take the place of secondary cars in households, we strongly urge you to seriously consider incentivizing slow speed zero emission vehicles. The reasons:

- Studies show that as we urbanize, we travel less and stay more local. In the South Bay, 70 percent of trips are 3 miles or less and 7 minutes (per Metro analysis)
- Slow Speed zero emission vehicles are less expensive than full speed vehicles and can be a useful circulator and first and last mile vehicle in disadvantaged communities

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

- California is experiencing a growing aging population who would be able to retain their independence but would feel more comfortable and safer in a slow speed vehicle.
- Local economies are enhanced by people staying local.
- Slow speed zero emission vehicles could be marketed as the 2nd, 3rd or additional car in a household since very often, multiple cars are needed to ensure that local errands and other needs are taken care of.
- Second vehicles are typically older, less fuel efficient, and provide a more effective target for GhG reductions than a family's primary vehicle.

If California is going to drastically accelerate the conversion to zero emission vehicles, it is imperative that all types of vehicles be promoted in the mix.

Clean Energy and Energy Efficiency - Pages 13 – 17

While California has developed ambitious and laudable statewide goals and strategies, the funding from utility companies for local government partnerships is allocated in silos. The impressive range of grant opportunities being developed by the numerous state agencies is daunting and fragmented for potential applicants. As an example, while the SBCCOG has agreements with our utility companies to reach thousands of people in the South Bay with energy efficiency messages, our funding does not allow us to provide information on renewables at the same time.

The time for silos is over and the state should direct the goal to be reducing GhG emissions and doing it with integrated programs and communications covering all available strategies. That would allow South Bay residents, business and public agencies to have a real one-stop opportunity to choose the strategies that work for them – whether the emissions reductions are achieved with energy efficiency, water/energy, renewables, transportation, energy storage and any other GhG emission reduction measures.

The SBCCOG looks forward to continuing our important sustainability work with CARB to accomplish the State's goals. Once again, we appreciate the opportunity to comment.

Very truly yours,



Jim Gazeley, SBCCOG Chair
Mayor Pro Tem, City of Lomita

cc: Mary Nichols, Chair &
Members of the Board