



**BELOW IS THE COMMENT YOU SELECTED TO MANAGE.
COMMENT 11 FOR CAPANDTRADE2012**

First Name: Nancy
Last Name: Pfeffer
EMail Address: nancy@networkpa.net
Phone Number: 562-901-2037
Affiliation: Gateway Cities Council of Governments

Subject: Response to CARB Questions on Investment of Cap-and-Trade
Auction Revenues
Comment:

The Gateway Cities Council of Governments (COG) represents 27 cities in Southeast Los Angeles County, as well as unincorporated communities of Los Angeles County, totaling about 2 million residents. The COG's purview includes transportation and air quality initiatives on behalf of its members. The COG's comments on the use of cap and trade revenues are provided below.

In order to effectively invest auction revenues to meet the goals of AB 32, the state should consider including an additional category of eligible investments: specifically, new technology for improved mobility of people and goods, as well as enforcement for goods movement. For passenger vehicles, the Gateway Cities developed their own Sustainable Communities Strategy under SB 375. The Gateway Cities SCS demonstrated that investments in congestion reduction would reduce GHG emissions by percentages equal to or greater than the SCAG regional targets. For goods movement, an integrated ITS technology plan for the Gateway Cities COG area is being developed and implemented. ("Intelligent Transportation Systems," or ITS, is the application of modern computer technology to manage congestion by improving transportation, signal and other traffic systems, including goods movement. ITS improves traffic flow and air quality as well as safety.) The Gateway Cities ITS strategy will improve connectivity among different transportation modes, eliminate bottlenecks and unnecessary delays, improve travel time and expand the options available for interregional and intra-regional travel, with resulting decreases in greenhouse gas emissions.

With regard to criteria prioritization, we believe improvements that can begin to show the fastest GHG reductions should receive a higher priority for selection. This would include deployment of new technology for transportation (general public as well as goods movement) that could show immediate improvements to public health. Improved mobility has a large improvement in GHG reduction and should also be prioritized but over a longer period of time - this would include a multi-modal approach that would address transit, commuter rail, active transportation and vehicular improvements in an integrated approach.

In summary, we would request that you expand the eligible list of qualified expenditures for cap and trade auction revenues to include Goods Movement Intelligent Transportation Systems (ITS) Deployment, Operations and Maintenance Funding; Goods Movement Technology and Enforcement Development; and Mobility Improvement Projects. Thank you for the opportunity to comment on this important new state program.

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