



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

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Randall Winston
Office of Governor Edmund G. Brown Jr
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Re: Comments on 2015 Draft ZEV Action Plan

Thank you for the opportunity to comment on the 2015 Draft ZEV Action Plan. While we find the draft 2015 ZEV Action Plan very good, it is flawed because it has left out one of the most promising opportunities for fleet conversion and that is Neighborhood Electric Vehicles (NEV).

The South Bay Cities Council of Governments conducted a two year demonstration project with these vehicles on regular streets, not in controlled communities. We gave the vehicles to residents for their personal use for two months at a time and tracked their movements with GPS. At the end of our project, we had over 250 people on the waiting list and participants said that they would have bought the vehicles if they were easily accessible, had a reasonable rebate and if there was a network of slow speed lanes that they could traverse in their communities without a lot of pre-planning.

NEVs can be important as secondary vehicles in families who need a car to address the over 70% of trips that are non-commute and average less than 10 minutes. LA Metro has validated those numbers for many parts of congested LA County. These vehicles are an effective response to the actual needs of many households as the SBCCOG's neighborhood electric vehicle project confirmed. (It should be noted that we continued our research with a full speed electric vehicle (BEV) project using the same model as the NEV project and once again could confirm the short distance of most trips.)

Additionally, our communities are aging. For seniors, neighborhood electric vehicles and other innovative personal mobility devices may be the missing mode for sustainable transportation and maintaining their independence for as long as possible. And for the disadvantaged community, they are a low cost option for their local needs and for the first and last mile to transit.

Our research also has shown that beyond price and quality, the biggest barrier to consumer demand for range-limited vehicles (BEV or NEV) is people's own unawareness of their true needs for range. Virtually every participant in our NEV demonstration and our BEV demonstration believed that their needs were much greater than their actual driving pattern. They were satisfied on the road with the BEV but that did not match their perception.

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The SBCCOG strongly believes that the 2015 ZEV Action Plan should include NEVs in several different sections for further action. The SBCCOG's recommendations which follow are listed in the order of the seven broad goals of the plan:

1. Build Consumer Awareness and Demand – People can read information about driving electric vehicles but it is their personal use that they care about. The SBCCOG recommends that the State encourage people to understand their own range needs through a web portal where they could input a sample of their transportation destinations on a weekly or monthly basis and learn about their actual range needs and the vehicle models that can address those needs. The SBCCOG unsuccessfully applied through the Caltrans Community Planning Program to fund in-person programs at a neighborhood scale to help households self-assess their transportation needs which would be another way to address this need.
2. Enable Necessary Infrastructure
 - a. NEVs charge on a level 1 charger. This means there is little to no drain on the current infrastructure. Incentives can be provided to disadvantaged communities with older housing stock that may need to re-wire to charge the vehicle.
 - b. Complete Streets - Incentives should be established to create slow speed lanes and networks as part of the definition of Complete Streets. The concept of Complete Streets is to ensure that travel rights of way are open to ALL modes. 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. This would be attractive to all age groups. The ZEV Action Plan should include support for the concept of slow speed lanes to create networks of slow speed lanes in communities.
3. Broad Access to ZEVs
 - a. ZEV sales – it is difficult for drivers to purchase an NEV because there are few dealerships, not centrally located and there is usually no adequate place to test drive. Dealerships should be encouraged to provide NEVs in their showrooms.
 - b. Rebates and Incentives – Currently NEVs purchasers are eligible for a \$900 rebate. Those who purchase vehicles with larger batteries get the much larger refunds. There should be a higher rebate for the purchase of an NEV and even larger rebate if the purchaser can certify that they are retiring a gasoline fueled vehicle. Low cost NEVs have the best chance of helping low income households reduce their carbon footprint at affordable prices and should be incentivized.
4. Capture Economic Development Opportunities – As the May 14, 2015 Harvard Business Review article cited below notes, over 200,000 low speed vehicles have been purchased in China. If California made a commitment to promoting slow speed vehicles, they could be manufactured in the state promoting jobs and ancillary economic activities. This could include slow speed vehicles of all types that would travel in the slow speed lanes and include Segways, electric skateboards, and potentially vehicles that we can't yet imagine. The real stimulus to economic development would not be just selling more units of what exists, but in opening opportunities to innovation. Trips are short in many places -- new devices can be invented at low cost and high effectiveness, if properly supported.

5. An Additional Goal - Preparing for a new way to 'drive': Autonomous ZEVs – Google's self-driving car is a 25 mile an hour car. Slow speed vehicles may become the first introduction of ubiquitous autonomous driving which would capture a multitude of trip needs. That is why the Google Self Driving Group reviewed our report and invited our project manager to a discussion of the way the vehicles were used in our demonstration and the positive response of our participants. The 2015 ZEV Action Plan should incorporate future driving possibilities such as ZEV autonomous vehicles for all speeds.

The report that the SBCCOG prepared on our NEV project can be found at:

Zero Emission Local Use Vehicles: The Neglected Sustainable Transportation Mode

<http://www.southbaycities.org/sites/default/files/LUV%20Report%20%20%20%207.10.2013.pdf>

Also, we would refer you to the Harvard Business Review article on slow speed vehicles and their importance entitled “**The Future of Electric Vehicles is Golf Carts, Not Tesla**” @

https://hbr.org/2015/05/the-future-of-electric-vehicles-is-golf-carts-not-tesla?fb_action_ids=10101190225335886&fb_action_types=og.shares

As the state looks forward to dramatically moving to a zero emission vehicle inventory, we urge you to consider the important role of slow speed vehicles and add them into the plan.

Thank you,



Jacki Bacharach
SBCCOG Executive Director