

ARB Testimony on Regional Targets--9/23/10

I should have marked my speaker card Reluctant Support.

TRANSDEF, the ... submitted a letter noting that we believe the bottoms up process used here was inappropriate in achieving a science based result. It was, instead, an inherently political process.

The climate truly does not care about the willingness of humans to change their lifestyles. Science tells us that serious reductions are needed in the very near term to prevent an accumulation of GHGs that will result in irreversible changes to the climate. The proposed targets will not do that.

These targets will result in increased emissions in this sector, due to population growth. This is going in the wrong direction, and would send the wrong signal to the rest of the world about ARB's view of the need for urgent reductions in GHG emissions.

We recognize you have a difficult problem in front of you, with the challenges posed by the oil and building industries. While we consider these challenges to be nothing short of suicidal in the long term, we recognize you need to deal with them.

I reviewed the BIA comment letters and found them to be based on arcane calculations they did themselves. The results of those calculations appear to be counterintuitive, and result in conclusions that are the opposite of our own. Their concern about CEQA vulnerability of projects is completely misplaced--a well designed project can show reductions upwards of 40%.

It would be our strong preference for ARB to adopt targets that result in a minimum of 5 MMT by 2020. However, if you are not going to do that, we ask that you adopt the staff proposal and reject the comments by the building industry as based in faulty math and faulty understanding of the transportation regulatory environment.

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