

Transportation Solutions Defense and Education Fund

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By E-Mail

Comments on CARB Proposed Scoping Plan

The Transportation Solutions Defense and Education Fund, TRANSDEF, has actively advocated for the regional planning of land use, transportation and air quality for the past 15 years. We commend the ARB for listening to public comments on the Draft Scoping Plan, and making the Proposed Scoping Plan, "Plan", a significantly better document. These comments seek to call attention to a major missing piece that needs to be added to the Plan.

With mobile sources being the biggest emissions category in the State's GHG inventory, the transport sector needs to be the Plan's top priority. The State's budgetary problems make it crucial that State transportation investments be made strategically. Yet the Plan never mentions Caltrans, or the billions of dollars it spends every year to make driving easier. Existing in a parallel universe in which there are no climate change worries, Caltrans neutralizes everything ARB is doing to reduce GHGs. Caltrans is the home of Business-as-Usual. Unless Caltrans is made a fundamental part of the climate change effort, there is no way the Scoping Plan can succeed.

Perhaps the Plan avoids this controversial subject out of an abundance of caution. We believe that this issue needs to be fully discussed somewhere in the AB 32 process, and suggest that the Scoping Plan is the proper place, in the absence of compelling reasons to the contrary.

Transportation Planning and Public Education

TRANSDEF participated in the LUSCAT process as well as the California Transportation Commission's Working Group on climate change additions to the Regional Transportation Plan Guidelines. These processes determined that a central part of the implementation of AB 32 must be a reduction in Vehicle Miles Travelled (VMT). The Bay Area's Joint Policy Committee adopted a Climate Change Plan in which "Reducing Driving" was a central strategy.

We are disappointed that this otherwise excellent Plan did not identify Reducing Driving as a recommended action in its own light. Regional reductions targets will tend to focus on the emissions reductions that come from better planned future land uses. However, because the driving habits of present residents are a much more

controversial issue, the public and the MPOs need to hear the ARB speak from its bully pulpit, emphasizing the importance of VMT reduction, separate and apart from regional planning. That simply isn't happening in the Proposed Plan.

The concern, of course, is that the Business-As-Usual trend for statewide VMT will overwhelm any successful efforts at GHG reductions. Changing that trend will require a profound shift in how Californians get around. TRANSDEF recognizes that change of this magnitude is politically challenging. The ARB needs to promulgate a strategy for how it will educate and inspire Californians to tackle the very difficult choices that face our State.

Transportation Funding

The problem here is that the State's transportation planning is focused on reducing traffic congestion. As a result, many billions of dollars are programmed to widen highways. These projects will result in making driving easier (although construction impacts increase congestion temporarily), which will result in increased VMT. Before the State can achieve any significant long-term reductions in GHGs, it will need to revisit the mission of the Department of Transportation, and completely revamp its focus. The day-in day-out efforts of Caltrans consistently result in more VMT and more GHGs. Until Caltrans is formally assigned a new mission, its ongoing operations will keep making the State's emissions worse.

California needs to dramatically change its priorities in transportation funding. We need to stop building highway capacity to accommodate growth in demand for single-occupant driving. Instead, we need to start pricing highways to provide appropriate economic incentives to discourage single-occupant driving, and to encourage carpooling, walking, biking and using transit. We need to invest the savings from ending highway construction, as well as the proceeds of congestion pricing, in cost-effective transit networks, including a system of subsidies to enable low-income people to maintain mobility. The sooner we start changing how our billions of dollars of infrastructure funds are spent, the sooner we will have viable lower-carbon alternatives to driving.

Instead of widening highways, an entirely different policy direction is possible--one which makes transit readily available and creates economic incentives to use it. Our website, www.transdef.org contains an extensive discussion of the Smart Growth Alternative we created, which was modelled in the EIR for the Bay Area's 2005 Regional Transportation Plan. Having struggled with the issue of highway vs. transit orientation for the past 15 years, we are extremely well aware of the resistance of local government, not to mention regional government, to eliminating funding for already-programmed "improvement" projects. However, given the State's financial constraints, it should be obvious to anyone that the State cannot afford to keep widening highways if it wants to build up the capacity of transit to become a significant part of the State's transport system.

If the State wanted to make a maximum effort to reduce GHGs, it would re-program the STIP and Proposition 1B Bond proceeds currently assigned to highway projects

over to the capital needs of improved transit. It would create new climate change fees and offsets, which will create major new sources for transit operations funding, the shortage of which is consistently the biggest obstacle to expanding transit service. And it would stop raiding the Public Transportation Account. Obviously, change of this magnitude would require the creation of a strong political consensus around the need for such comprehensive solutions. We raise these comments to stress the point that the problem in achieving substantial long-term GHG reductions in the transportation sector is primarily a political one, rather than a technical one.

The Role of CMAs

TRANSDEF urges the ARB to raise with the Legislature the issue of the future role for Congestion Management Agencies. These legislatively created agencies are mandated to reduce congestion, a mission made obsolete by climate change. They have become the institutional driving force for highway widening projects within California. These projects and the development they facilitate, however, are central to the State's trend of ever-increasing VMT. In a letter last year to MTC, the Bay Area CMA Directors declared that climate change should not be a part of regional transportation planning. The subtext was that they should be left alone to work on their highway projects.

CMAs as institutions are inherently hostile to assisting with the implementation of AB 32. We believe that reducing mobile source GHGs will require legislatively changing the mission of CMAs. The politics of regional transportation planning agencies will remain stuck until this is done.

TRANSDEF's Own Strategies

TRANSDEF has come before the Air Resources Board several times to ask the agency to adopt a list of Transportation Control Measures that it finds to be Reasonably Available. Unfortunately, VMT reduction was not seen back then as an area CARB felt comfortable in. The recognition of human-caused global warming, and the accompanying need to reduce VMT, should change that.

Because the California Clean Air Act requires non-attainment areas to adopt all feasible control measures, TRANSDEF believes a list of Reasonably Available Control Measures to be the most direct regulatory route to an effective VMT reduction program. Once CARB adopts a list of Reasonably Available TCMs, air districts will then be required to implement them in their air quality plans. We would be pleased to discuss innovative TCM concepts in detail with CARB.

We thank the ARB for considering these comments as it innovates a way to our future.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn, President