

Testimony at ARB Scoping Plan Adoption Hearing 5-22-14

I'm DS w/ TRANSDEF. We are transit advocates that focus on the intersection of climate change and transportation.

There's a lot to like in this Update: The new-found focus on short-lived climate pollutants will allow ARB to be especially effective, while generating significant co-benefits. We really appreciate the commitments to increase the rate of emissions reductions, and to set a mid-term target.

I'd like to summarize three problematic areas we covered in written comments that have not been addressed in the Plan:

1. This Update has not established a causal connection between the first Scoping Plan's measures and the reduced emissions of the past five years. Unless you know how effective the measures have been so far, you have no basis for confidence in the ability of this Update to achieve its goals. We need to know the impact of the recession on electrical consumption and on VMT.
2. High-speed rail should not be shown in your Plan as a GHG emissions reduction measure. There are at least two

major reasons why the claimed GHG emissions reductions are a very expensive fantasy:

A: They depend on \$30 billion of project funding that the Authority doesn't have and can't get.

B: The emissions calculations leave out the massive amounts of concrete that the project design calls for. The amounts are large enough to increase the state's overall cement production, which is a large source of GHG emissions. A paper I submitted to staff calculated that the entire HSR project, including the cement and other construction materials, would actually increase GHGs for the first 20 to 30 years of operations.

That makes the EA's GHG impact assessments incorrect: Construction 8b and Cumulative 8 should be significant and unavoidable. Interestingly, Attachment D to Resolution 14-16 is silent on GHG impacts. The flawed assessment was based on a paper issued by the HSR Authority, and which was endorsed by your Board's chair. Standing behind an incomplete analysis like this harms the scientific credibility of this agency.

Finally, this is a science-based plan. That's good. But it is missing an analysis and a plan for the political dimension. Political support is essential to implementing this plan. ARB needs to be formally thinking about the politics. Thank you.