

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

January 21, 2014
By E-Mail

Mary Nichols, Chair
Air Resources Board
P.O. Box 2815
Sacramento CA 95812

Re: 14-1-4, SB 375 Implementation

Dear Chair Nichols:

I am writing on behalf of the Transportation Solutions Defense and Education Fund, TRANSDEF, a California environmental non-profit advocating for the regional planning of transportation, land use and air quality. We are shocked at the inadequacy of the staff report in the Board Book for your January hearing on SB 375 implementation. The report does not even attempt to answer the two most pressing questions this hearing raises for policy makers: What are the aggregate GHG emissions reductions from SB 375 implementation, and how do they compare to the 2008 Scoping Plan's Regional Transportation-Related GHG Target of 5 MMTCO₂e?

Without that information, it is impossible for ARB to evaluate the effectiveness of its management of SB 375 implementation, and more specifically, the effectiveness of its adopted regional emissions reduction targets.¹

¹ TRANSDEF continues to doubt the consistency of the adopted targets with the legislative findings for SB 375, which state that:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve **significant additional** greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)

We have witnessed up close the controversy accompanying Sustainable Communities planning. We are also very aware of the pushback ARB received from the MPOs in their target submissions. We recognize that this issue is a political minefield.

Our country is suffering from massive climate denial. An informed public is essential in gathering the political will to seriously reduce GHG emissions. However, the public can't be educated about the climate consequences of its auto-based lifestyle if aggregate emissions information is swept under the rug. A good set of numbers is invaluable in deciding how to go forward.

Californians expect ARB to be at the forefront of protecting the climate. If Board members are privately concerned that emissions reductions via SB 375 on the scale of the Scoping Plan target would be too disruptive politically, the Board needs to have that discussion in public, and adopt replacement Scoping Plan measures. Otherwise, ARB will be complicit in the denial fostered by the fossil fuel industry.

TRANSDEF urges the Board to order its staff to prepare an analysis of the aggregate GHG emissions impact of SB 375 implementation. That information will be critical in deciding whether to revise the regional GHG emissions reduction targets in 2014.

Sincerely,

/s/ DAVID SCHONBRUNN

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