

Transportation Solutions Defense and Education Fund

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October 10, 2014
By E-Mail

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

Re: Regional Target Setting Update

Dear Chair Nichols:

TRANSDEF, the Transportation Solutions Defense and Education Fund, would like to offer you our thoughts in preparation for your Board's consideration of an update of the regional GHG emissions reduction targets:

Alarming, regional GHG emissions are increasing, despite the legislative intent of SB 375 to generate additional reductions beyond those achievable with statewide measures. It should be clear that the 2010 regional targets are not achieving what they were mandated to accomplish. Given that, TRANSDEF urges the Board to order the regional targets to be updated.

Is there a Climate Crisis?

TRANSDEF is conversant with the long-term consequences of having 400+ ppm CO₂ in the atmosphere. We anticipate catastrophic conditions for the next generation if our generation's response is inadequate. We are among a disappointingly small group of advocates that recognize that the human race is in a climate crisis. By its actions, ARB appears to us to not share our sense of looming crisis.

The *Preliminary Draft Staff Report on the SB 375 Greenhouse Gas Reduction Target Update Process* lacked any sense of urgency. As a result, it asked the wrong questions. The Roundtable process also lacked a sense of urgency. Participants there seemed far more concerned that interregional travel not impose a responsibility for VMT reduction.

It seems to us that the first step in deciding the Board's preferences on regional targets needs to be to decide "Are we facing a climate crisis?" The comprehensiveness of the response will depend on the degree of crisis perceived.

The Bottoms-Up Approach

We think you need to reconsider the 2010 decision to use a bottoms-up approach, as it is not working. No transportation agency we are aware of has yet acknowledged that

climate change is its problem. They all act as if some other agency--most likely ARB--is going to take care of the problem, and leave them out of it. They see no need to change their practices, and are truly oblivious to the GHG consequences of continuing to facilitate solo driving.

We have recently been involved in several counties' transportation plans. Alameda adopted a plan with a 46% increase in VMT. While the plan claimed to reduce per capita GHGs by 24%, upon close examination, that claim relied entirely on Scoping Plan measures. When they were removed from the calculation, the plan will result in a **31% increase** in per capita GHGs. Contra Costa is currently workshopping a plan with a 35% in VMT, which will result in a **5.5% increase** over current per capita GHG levels.

As if these trends are not troubling enough, MTC recently adopted a revised set of Guidelines for Countywide Plans (in response to a lawsuit by advocates). The draft Guidelines called on counties to look to the regional goals expressed in the Sustainable Communities Strategy. In a strong pushback by local jurisdictions, the Guidelines were amended to make them even more explicitly voluntary than Guideline inherently are. Without strong state direction, local agencies will continue to insist on maintaining Business as Usual, and ignoring their responsibility for climate change.

These plans are clearly heading in the wrong direction. The setting of new regional targets would send an important message to transportation agencies across the state, waking them up to the realities of climate change.

The Top-Down Approach

The recent SB 375 Implementation review avoided the question of the cumulative statewide emissions reductions resulting from the regional targets. Buried in an obscure ARB publication was the calculation that the SB 375 program will produce reductions of 3 MMTCO_{2e}, where the 2008 Scoping Plan had a placeholder target of 5 MMTCO_{2e}.

The 2008 Scoping Plan did not identify enough measures to meet the target statewide emissions reduction, so falling behind with this program is potentially serious. Since that time, climate science has advanced, making it clear that larger reductions are needed, and needed sooner than previously thought, as the models had been overly conservative. Given these developments, it should be clear that the state needs to achieve greater emissions reductions from the regional targets.

This is why a top-down approach is needed: ARB needs to use the best science available as its starting point, and work its way backwards to what is needed to achieve a statewide target by the jurisdictions that approve land use and transportation projects.

Conclusion

The MPOs have made it clear on multiple occasions that they oppose a new round of target setting. That is hardly a surprise, as MPOs are inherently averse to change and to mandates. They are not leading the fight to protect the climate.

The challenge for Board members now is the question "Are we facing a climate crisis?" When each member is able to answer it in a way that they could feel comfortable defending to future generations, ARB will be ready to make wise policy decisions.

We would be pleased to answer any questions you might have, at the phone number above.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Appendix

The following points, which we submitted to ARB in 2010 for the first target setting, are still relevant to today's update:

1. We find it unimaginable that the Draft Targets report did not identify the aggregate effect of the proposed targets. The answer to the question "will we accomplish our Scoping Plan goals with these targets?" should have been central to the process. The targets are useless, or even counterproductive, if they are not directly tied to the Scoping Plan. (Please note that we are not intruding into the RTAC's recommendation on how the target is to be expressed at the regional level--we refer here to tying the statewide total emissions to the Scoping Plan.)
2. **Only a top-down process that results in a regional target that is tied to a statewide plan to accomplish the Scoping Plan's goals can provide sufficient justification for making uncomfortable policy decisions at the local level. Locals need this backup.**
3. The undersigned was an active participant in the Working Group that revised the CTC's RTP Guidelines in response to the adoption of SB 375. Throughout that process, we expected ARB to allocate the regional targets so as to achieve statewide targets. That was not the case with the Draft Targets.
4. ARB staff mentioned several times today that the targets need to have "a sound technical basis." Please be aware that the MPO submissions which became the basis for the draft targets are already strongly colored by political judgment.

5. We observe with dismay that the absence of a statewide emissions total in the draft targets report strongly implies that the target setting process has been turned into a politicized process that caters to the MPOs' desire to minimize their targets, rather than a process with "a sound technical basis."
6. We notice the acquiescence of the Draft Targets report to the notion that because land use effects are long-term, that it is logical that the 2020 targets be lower than the 2035 targets. This approach completely ignores the realm of pricing measures which can be implemented very quickly. Note the absence of pricing in: "This range is based on the potential reductions from land use and transportation planning scenarios provided by the MPOs." (p. 3, Draft Targets report.)
7. We associate the absence of a discussion of the feasibility of pricing with the lax national attitude to what we understand to be a pressing emergency. Scientists inform us that there are only a few years left to correct our emissions overhang before irreversible changes take place. We call on ARB to use the best science to recognize the urgent need for early reductions, which would require strong leadership to educate the public about the need for increased pricing of driving.
8. Similarly, it is solely a function of the public's lack of understanding of the threat of climate change that "extremely aggressive policy scenarios ... could not realistically be implemented." (p. 4, Draft Targets report.) Once peacetime America was attacked, it rapidly geared up to fight World War II, and endured great privation for the public good. The Draft Targets report clearly expresses a lack of resolve for the kind of societal mobilization that we believe is called for by climate science.
9. We reject the idea that lower, more achievable, targets are a wise idea. We don't have 10 or 20 years to build confidence. Unfortunately, climate is not a problem that can be responded to at a pace that is comfortable for government.
10. We agree that target setting should include the provision of a margin of safety, as is commonplace in the setting of health-based criteria pollutant standards.
11. The very fact that the San Joaquin Valley is expected to grow so much means it can realistically handle a much higher target. Would it really be acceptable for the Valley to actually increase its GHG emissions (or even keep them level, with Pavley)? Giving the Valley an aggressive target will encourage the use of Best Practices for new development. It is crucial to not squander the opportunity to reshape settlement patterns. This will bring substantially lower future emissions.
12. Page 3 of the Draft Targets report uses the phrase "improving the efficiency of each region's existing transportation network." This is the current Caltrans euphemism for widening highways. Current research indicates that while highway widening may have congestion relief benefits in the short-term, in the long-term such projects induce further demand, resulting in increased trips, longer trips, and increased VMT and GHG emissions. (citations available.) We urge ARB to avoid this phrase, as well as the transportation planning strategy that underlies it.