

Transportation Solutions Defense and Education Fund

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“Solutions Is Our Middle Name”

July 14, 2010
By E-Mail

Doug Ito
Air Quality and Transportation Planning Branch
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Regional Target Setting

Dear Mr. Ito:

TRANSDEF, the Transportation Solutions Defense and Education Fund, would like to provide you with the following points in response to today's webcast on the setting of regional GHG emissions reduction targets:

1. The audio webcast worked extremely well, with excellent sound quality. However, the videocast apparently had severe bandwidth limitations, resulting in continuous stuttering. It was simply not acceptable.
2. We urge you to attempt to involve the Mayor of West Sacramento in future presentations to local government officials. He has an extraordinarily important message for them. We can't imagine a better person to encourage local government cooperation with ARB, which is crucial to the success of SB 375.
3. It is critical to remember that this target setting process is not just a technical exercise. ARB's work will become a national and global model for the responsible planning of development. If we are to make headway with global warming, it is crucial that the targets lead to sufficient change to meet AB 32 Scoping Plan goals, so as to avoid potentially catastrophic impacts on the human habitation of the Earth, as well as drastic impacts on the natural world.
4. Given that, 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.)

5. 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.
6. 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.
7. 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.
8. As an example of the undermining of a sound technical basis, please see our observations about MTC in our letter of 7/7/10. We testified at MTC last week that it is clear that MTC staff is trying to lessen expectations as to the range of feasible emissions reductions.
9. 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."
10. 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.)
11. 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.
12. 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.
13. 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.
14. 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.

15. 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.
16. TRANSDEF is very involved with High-Speed Rail ridership, as this is a central issue in our litigation with the HSR Authority. It is not clear from the Draft Targets report what HSR ridership is projected for the San Joaquin Valley. We notice that the Valley MPOs subtract the through-trips from their emissions analyses. If through-trips are being ignored by MPO models, they need to be considered separately by ARB, so as to account for all emissions. As strong supporters of a properly designed HSR system, we believe these through-trips should be accommodated to the maximum extent possible by HSR and other forms of rail.
17. While we found much of the Southern California BIA testimony helpful, we do not agree with the assertion that land use is a poor lever for changing emissions. While BIA is correct in the short term, ARB has recognized that changing land use patterns in the long-term is essential for restraining growth in VMT and GHG emissions, to avoid wiping out reductions accomplished in other sectors.
18. 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.
19. ARB should verify the appropriateness of the post-processing submitted by the MPOs, as some of them have a huge impact on the per capita emissions reductions. Does it deal only with model 4D inadequacy, or is this also where the XX through-trips are stripped out of the model?

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

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President