

Transportation Solutions Defense and Education Fund

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“Solutions Is Our Middle Name”

September 15, 2010
By E-Mail

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Draft Regional Targets

Dear Ms. Nichols:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is an environmental non-profit dedicated to the regional planning of transportation, land use and air quality. We have previously commented on the Scoping Plan and Draft Regional Targets. Now that the calculations for the draft GHG regional emissions reduction targets have been released¹, we are troubled that the draft targets result in total 2020 regional transportation-related emissions that are higher than 2005, and higher still in 2035. This is no way to get to 1990 GHG levels by 2020. These comments are aimed at preserving the integrity of the AB 32 Scoping Plan.

ARB has interpreted SB 375 as a call for a bottom's-up process. We assert that ARB has misinterpreted the law. All the law prescribes is that “Prior to setting the targets for a region, the state board shall exchange technical information with the metropolitan planning organization and the affected air district. The metropolitan planning organization may recommend a target for the region.” G.C. 65080(b)(2)(A)(ii).

The ARB is responsible for determining which regional targets will best implement the intent of AB 32. The Scoping Plan calls for a 5 MMTCO₂E contribution from regional transportation-related GHG targets, while a recent staff-provided spreadsheet shows only a 3.4 MMTCO₂E reduction by 2020 from this component of auto and light truck use. This indicates the need for a top-down process, to ensure the implementation of the Scoping Plan and the accomplishment of the State's 2020 target. The importance of meeting at least the 5 MMTCO₂E placeholder goal is brought home by 34.4 MMTCO₂E

¹ “Documentation of the Resulting Emission Reductions based on MPO Data” August 2010.

of reductions that are required by the Scoping Plan, but which are not associated with implementation measures as of yet.

The question “will we accomplish our Scoping Plan goals with these targets?” should have been central to the target-setting process. But it clearly wasn't. It looks to us like the target setting process has been turned into a process that caters to the MPOs' desire for minimal controversy, rather than a process with “a sound technical basis.” We are fully cognizant of the political challenges faced by ARB. TRANSDEF urges the Air Resources Board to step up to the challenge, armed with the best science available.

Our organization has been involved in the development of RTPs at the MTC for the past 16 years. We created what we believe to be the first published Sustainable Communities Strategy: the 2005 TRANSDEF Smart Growth Alternative, which was modeled in the MTC's RTP EIR. We were active participants in the Working Group that revised the CTC's RTP Guidelines in response to the adoption of SB 375. This breadth and depth of experience forms a basis for the following observations:

San Joaquin Valley Targets

The very fact that the San Joaquin Valley is expected to grow so much means it can realistically handle a much higher target. Is it really be acceptable for the Valley to actually increase its GHG emissions? 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 make a tremendous difference in 2050 emissions.

Induced Demand

Caltrans and the MPOs are stuck in a 1980's view that expanding capacity reduces congestion and therefore reduces GHG emissions. That view is the result of using obsolete models, which fail to account for induced demand. 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.

All of Caltrans' planning is infected with this view. While the new RTP Guidelines call for the big four MPOs to have models that will properly handle induced demand, such models (except for SACOG's) do not currently exist. So the MPO submissions upon which the Draft Targets are based are not sound technically.

Three of the big four MPOs are thus significantly undercounting the emissions-increasing impacts of their highway expansion programs. This is especially worrisome in regards to selecting infrastructure investments that will set a foundation for achieving California's very aggressive 2050 goals. We urge ARB to delve into this critical issue partnered with BAAQMD, which included the following language in TCM B-3, the Bay Area Express Lane Network, in the Clean Air Plan it adopted today:

The estimated emission reduction benefits for this measure are based on the anticipated improvement in average vehicle speed due to expected reduction in congestion in the affected corridors. However, this measure will also increase vehicle capacity on segments within some of these corridors. While the regional travel model estimates transportation emissions due to temporal, spatial and mode shifts resulting from increased roadway capacity, the potential emission reduction benefits of this measure may be eroded if the increased capacity in these corridors encourages additional vehicle travel or changes in land uses that would result in longer vehicle trips. To address this issue, the Air District will perform an independent analysis to evaluate the long-term impacts of this measure on vehicle travel and emissions. (emphasis added.)

Pricing

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. We associate the absence of a discussion of the feasibility of pricing with the lax national attitude towards 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. This will require strong leadership to educate the public about the need for increased pricing of driving. We fully recognize this will take political courage and offer to assist in any way we can.

Timing

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.

Margin of Safety

We recommend that target setting include the provision of a margin of safety, as is commonplace in the setting of health-based criteria pollutant standards.

Conclusion

Right now, science is telling us what needs to be done and government is not doing it. This target setting process is not just a technical exercise. ARB's work needs to become a national and global model for the responsible planning of development. If human civilization is to survive global warming, it is crucial that targets be adopted that lead to sufficient change to at least meet the AB 32 Scoping Plan goals. Failure to do so is not an option.

It will take a top-down process tied to the Scoping Plan's goals to provide sufficient justification for making uncomfortable policy decisions at the State, regional and local levels. Local elected officials especially need this kind of evidentiary backup--they will be on the front lines, making scary decisions for a public that does not like change. Please give them the leadership and the guidance they need to play their part in the upcoming difficult transition to a low-carbon way of life.

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

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President