

COMMENTS ON AB 32 DRAFT SCOPING PLAN, CALIFORNIA AIR RESOURCES BOARD

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BY: Transportation and Land Use Coalition

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California Air Resources Board Members and Staff:

The Transportation and Land Use Coalition, a partnership working for World Class Transit and walkable communities in the Bay Area and beyond, applauds the Air Resources Board's (ARB) comprehensive and ambitious draft AB 32 scoping plan. For many sectors it will propel California into a leadership position on both the national and international stage.

Unfortunately the one place that it truly falls short is on the reduction targets for "Local Government Actions and Regional Targets". The draft scoping plan calls for only 2 million metric tons (MMT) of GHG reductions from regional targets. In 2006, California's Climate Action Team (CAT) predicted the State to eliminate 9 MMT from this sector from "blueprint" programs alone.

The 2 MMT is equivalent of a 2% decrease in per capita VMT by 2020. If the number was calculated simply on the new increment of growth that will take place between 2010 and 2020 – in other words existing residents will continue to drive as much as they do today – then this decrease may be a reasonable estimate.

However, there are tremendous potential efficiencies to be gained from transportation pricing, new transportation infrastructure, and education and incentive programs. Some of these programs are acknowledged in the scoping plan and are listed as "under evaluation". These include the Indirect Source Rule, Pay-As-You-Drive Insurance, Congestion Pricing, and Education/Incentive Programs. The scoping plan acknowledges that these could bring up to another 4 MMT.

In the scoping plan appendices there are a host of additional programs that are discussed and essentially we believe these should all be undertaken.

We encourage CARB to make the following revisions to the Scoping Plan:

- CARB should set a higher reduction target for "regional targets" based on VMT (Vehicle Miles Traveled) reductions. We are working with ClimatePlan members and national experts to determine the potential reductions and will have that analysis to you shortly.
- Transportation efficiency measures should not be separated out from these "regional targets". Since multiple programs are likely to be introduced at the same time, it will

be very difficult to know how much benefit to assess each strategy. This is congruent with a “regional blueprint” approach that simultaneously considers land use scenarios along with transportation systems, pricing and operational scenarios.

- Regional targets should be distinct from local government targets. Local government actions and regional targets are currently combined. Any local government actions that can reduce VMT, such as programs to increase transit or carpooling use, or improved community design, should be captured under the regional targets section. There is an obvious danger of double counting, or simply creating burdensome and inefficient measurement protocols by combining these strategies together. It is possible that some of the other local government strategies can be counted separately, such as recycling or community energy, but it seems that in all of these areas the issue of double counting remains.
- CARB should allocate transportation GHG targets at the regional scale and set interim milestones to gauge whether each region is on track to achieve the targets
- The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion. While CARB cannot do that through the state budget process there may be ways to enable the state or regions to raise additional funds for climate friendly transportation programs from carbon-based revenue.
- Cities, counties and regions should be given incentives to conserve forests and working landscapes that sequester carbon, provide local food, and reduce wildfire hazard.
- Municipalities should be given additional financial and technical resources to develop climate-friendly specific plans, general plans, etc.

There is agreement amongst a broad range of stakeholders that we need to move to a smart land use paradigm as California adds another 20 million new residents or more by 2050. There is also a growing movement towards regional cooperation, with all major regions in the state undertaking blueprint planning over the last seven years

While all stakeholders might not agree on the strategies, that should not make CARB timid about addressing this in the scoping plan. We believe it is possible to have flexible implementation strategies that can be adapted by each region, and still meet much higher reduction targets than were sent out by the draft scoping plan.

There is, understandably, concern about how reductions targets in this sector can be enforced. In other words, what would CARB do if a region had a blueprint and was implementing a variety of VMT reduction strategies but was not meeting its GHG/VMT milestones by 2015, 2017, or some other date?

One possible direction is to rely on a few scalable implementation mechanisms. These

mechanisms would provide valuable resources to regions as they work to reduce VMT, promote walkable communities, and protect valuable farmland and open space. They could include

- An Indirect Source Rule that promotes lower-carbon community design and provides financing for planning and projects that are climate-friendly.
- public goods charges on gasoline to fund alternative transportation,
- container fees to fund low-emission goods movement, or
- congestion pricing as a way to raise revenue for transportation alternatives while helping manage demand.

These tools would essentially represent additions to the very limited toolbox currently available to cities, counties and regions.

Some of these measures could initially be voluntary or set at modest levels. With others, such as road-pricing mechanisms, the state could simply provide statutory authority that would allow regions to choose whether and how to implement these programs.

Then, CARB would measure VMT at certain milestone years, and if a region is not meeting these milestones then some of these tools could be strengthened or “scaled up” in order to achieve greater GHG reductions. For example, the GHG per capita threshold for the Indirect Source Rule in that region could be reduced or the container fee increased to fund additional goods movement.

Since all of these programs utilize efficient market mechanisms and pricing signals -- they put a price on high-carbon activities and use that funding to incentivize low-carbon alternatives -- there should be strong economic, social and public health benefits from their implementation. These benefits would include significant traffic congestion reduction, lower overall transportation costs as more people gain access to affordable alternatives, cleaner and faster goods movement, reduced particulate matter in local communities, and more.

Each of these programs should contain measures to ensure significant benefits accrue to low-income communities, and that an equity analysis is conducted to ensure the benefits to these communities are at least as great as any cost.

We must do everything possible to prevent global warming’s most disastrous consequences and costs, and a stronger land use section would not only help us achieve the 2020 reduction targets, but set us on a more clear trajectory towards reducing emissions 80% by 2050. We look forward to working with you as you finalize the scoping plan and develop an implementation plan that can improve the quality-of-life for all Californians while setting an extraordinary model for the world.