Comment 1 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: John
Last Name: Costa
Email Address: Johnc@northstatebia.org
Affiliation:

Subject: Emission Reduction Targets
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/1-nsbia_ltr.arb_targets.7-14-10.pdf

Original File Name: NSBIA Ltr.ARB Targets.7-14-10.pdf

Date and Time Comment Was Submitted: 2010-07-14 13:49:40

No Duplicates.

Comment 2 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: David
Last Name: Schonbrunn
Email Address: david@Schonbrunn.org
Affiliation: TRANSDEF

Subject: Comments on Target Setting
Comment:

Please see attached letter.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/2-arb_target_setting.pdf

Original File Name: ARB target setting.pdf

Date and Time Comment Was Submitted: 2010-07-15 02:00:35

No Duplicates.

Comment 3 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Patrick
Last Name: Cameron
Email Address: mrpat4u@cox.net
Affiliation:

Subject: Healthier Transportation
Comment:

Dear Chairman Nichols,

I am writing to thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375.

Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving.

Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with addressing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression.

Please continue to support public health by establishing strong regional greenhouse gas targets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-16 15:06:19

27 Duplicates.

Comment 4 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Walt
Last Name: Seifert
Email Address: saba@sacbike.org
Affiliation: Sacramento Area Bicycle Advocates

Subject: Need for more ambitious SB 375 targets
Comment:

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/4-sb_375_target_comments_to_arb.doc

Original File Name: SB 375 target comments to ARB.doc

Date and Time Comment Was Submitted: 2010-07-16 14:50:06

No Duplicates.

Comment 5 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Don
Last Name: Wood
Email Address: dwood8@cox.net
Affiliation: Pacific Energy Policy Center

Subject: Setting and enforcing regional emission reduction targets
Comment:

Please see attached comments that will be submitted at the July 21 targets setting public input meeting in San Diego. Please share these written comments with your board members and include them in the formal record of CARB's AB 375 implementation proceeding.

Thank you,

Don Wood, Senior Policy Advisor
Pacific Energy Policy Center
619-463-9035
dwood8@cox.net

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/7-72110_carb_meeting_comments.doc

Original File Name: 72110 CARB meeting comments.doc

Date and Time Comment Was Submitted: 2010-07-16 15:48:51

No Duplicates.

Comment 6 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Stephen
Last Name: Hansen
Email Address: hansens2@pacbell.net
Affiliation:

Subject: Thank you
Comment:

```
Keep up the good work!!
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-17 00:22:18

No Duplicates.

Comment 7 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Gerald
Last Name: Cauthen
Email Address: Cautn1@aol.com
Affiliation:

Subject: MTC - Need for a more assertive program
Comment:

Dear Mr. Goldstene,

I have been involved as a professional engineer and consultant, and as a transit advocate, in Bay Area transportation issues since 1970. The attached letter to Ms. Nichols reflects impressions developed over this period.

Gerald Cauthen

former Manager of Muni Transit Improvement Program

former Parsons Brinckerhoff Senior Engineering Manager and Transportation Vice President

former Manager of Transit Systems, Korve Engineering

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/30-ltr_to_carb_july_0910.docx

Original File Name: Ltr to CARB July 0910.docx

Date and Time Comment Was Submitted: 2010-07-19 07:48:36

No Duplicates.

Comment 8 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: City of
Last Name: Lakewood
Email Address: pbeltran@lakewoodcity.org
Affiliation:

Subject: Comments on Proposed Targets
Comment:

```
The City of Lakewood agrees with the comments made by the Gateway
Council of Governments regarding the proposed targets.  In
particular:

* There is still great uncertainty as we approach this target
setting process for the first time.
* Please continue to allow target flexibility to the regions.
* Please consider retaining the target as a range rather than a
hard number.
* Although undertaken voluntarily, the SCS effort comes at a time
when local governments have extremely limited funds for
implementation.
* Please find ways to offer resources to local governments to
support the process.
* Please support the restoration for transit and redevelopment, as
these funds are essential to the successful implementation of SB
375 and to achieving real reductions in GHG emissions.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-19 15:17:02

No Duplicates.

Comment 9 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Duncan
Last Name: McFetridge
Email Address: sofar@nethere.com
Affiliation: SOFAR and CNFF

Subject: Comments on SB 375 for CARB Workshop in San Diego
Comment:

Dear Chairman Nichols,

Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF), two organizations dedicated to progressive land use planning and the protection of vital natural resources in San Diego County, submit this letter with regards to target setting for SB 375.

For the last several years, we have diligently participated in the San Diego Association of Governments' (SANDAG) transportation planning processes in an effort to create sustainable regional transportation and land use for the San Diego region. SANDAG's previous regional transportation plan, (the 2030 RTP), was a failure on many levels. SOFAR, along with the Attorney General of California, criticized SANDAG for that Plan's continued emphasis on funding highway capacity at the expense of transit service. Not surprisingly, the environmental impact report (EIR) for the 2030 RTP determined that, if implemented, the Plan would have significant unavoidable and unmitigable impacts in almost every environmental category:

"Significant unavoidable and unmitigable impacts would occur to land use, visual resources, energy, and biological resources and there would be cumulatively significant impacts to land use, visual resources, air quality, noise, energy, global climate change, geology/paleontology, water resources, and biological resources, cultural resources, hazards and hazardous materials." Source: SANDAG Statement of Overriding Considerations for the 2030 RTP.

In 2007, we were party to a settlement agreement with SANDAG regarding the 2030 RTP. This Agreement requires that SANDAG prepare and include in the 2050 RTP environmental impact report an Urban Area Transit Strategy. The purpose of the Urban Area Transit Study is to assess opportunities for making transit time-competitive with the automobile, evaluate parking management strategies that promote transit usage, develop transit mode share goals, and to identify funding strategies for capital and operations for new services.

SANDAG is currently in the process of developing the 2050 RTP. Notwithstanding the requirement to seriously study the Urban Area Transit Strategy and to include a Sustainable Communities Strategy (SCS) in compliance with SB 375, SANDAG appears intent on continuing its business as usual approach to accommodating and encouraging the private automobile. SANDAG is not planning for

substantial change with the 2050 RTP; instead, the SANDAG Board of Directors recently voted to use full build-out of the 2030 RTP as a starting point for the new plan. As a result, according to planning experts, in the near future SANDAG will be spending approximately 278% more money on road expansion than on transit expansion. Indeed, under the 2030 RTP, SANDAG proposed 20-40% more roadway and freeway expansion than that expected to be built in Los Angeles, San Francisco and Sacramento.

In a time when nearly every urbanized region appears to be promoting and planning transit-oriented development, SANDAG's antiquated approach to transportation planning is extraordinarily alarming. At the same time, SANDAG should be the leader inasmuch as it is the first Metropolitan Planning Organization ("MPO") to develop a Sustainable Communities Plan pursuant to SB 375. Yet SANDAG is leading us down an entirely unsustainable path while its preliminary modeling paints a deceptively rosy picture. SANDAG's preliminary modeling data shows that the region could achieve relatively high GHG reduction targets when compared to California's other large MPOs. Yet something is very wrong with this picture: how would the 2050 RTP result in substantially reduced GHG emissions when it uses the highway-oriented 2030 RTP as its foundation? It seems the answer is that SANDAG is managing freeway capacity to achieve emissions reductions instead of making any substantial changes to the transportation system such as prioritizing and funding major transit initiatives such as the Urban Area Transit Strategy. The tragedy looming over this process is that SANDAG will potentially get a free pass on a documented unsustainable transportation plan, while using emissions reductions to claim sustainability.

In San Diego, the problem with focusing on GHG emission reductions is that that we are treating a symptom of unsustainability, rather than addressing the cause. The environmental analysis of the 2030 RTP suggests that the fundamental cause of climate change and many other regional issues is the region's transportation system.

In sum, we are extremely concerned that the San Diego region will not make the substantial changes to our transportation infrastructure – prioritizing transit and deemphasizing freeway and roadway projects – that are necessary to actually meet the challenges of SB 375 and improve the region's quality of life. Unless agencies such as CARB apply pressure to MPOs to adhere to the spirit and intent of SB375, the 2050 RTP will not result in a sustainable region.

For further information, please refer to our website: www.transitsandiego.org

In addition, you may view comment letters that we have submitted to SANDAG, and an opinion piece that was published in San Diego on this subject here:
http://www.transitsandiego.org/transitsandiego/pdf/SOFAR_Letter_5.27.10.pdf

http://www.transitsandiego.org/transitsandiego/pdf/SOFARCNFF_7.16.10_Final.pdf

http://www.signonsandiego.com/news/2010/jul/16/long-term-transportation-plan-deeply-misguided/

Thank you for considering these important matters.

Sincerely,

Duncan McFetridge, Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-20 15:37:44

No Duplicates.

Comment 10 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Gil
Last Name: Hurtado
Email Address: gcisneros@gatewaycog.org
Affiliation: Gateway Cities Council of Governments

Subject: Gateway Cities COG Comments on SB 375 Target Setting
Comment:

n/a

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/35-july_20__2010_carb_re_sb_375_target_setting.pdf

Original File Name: July 20, 2010 CARB Re SB 375 Target Setting.pdf

Date and Time Comment Was Submitted: 2010-07-20 17:11:15

No Duplicates.

Comment 11 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: David
Last Name: Schonbrunn
Email Address: david@Schonbrunn.org
Affiliation: TRANSDEF

Subject: See RTAC Comment List for our other comments
Comment:

```
See the bottom of the RTAC Comment List for our other comments,
which pertain to the false premise in MTC's scenarios that
infrastructure doesn't help reduce GHGs. MTC is attempting to
preempt a critical debate on what projects should be in the RTP,
and lower expectations on what can be accomplished in emissions
reductions.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-20 22:43:46

No Duplicates.

Comment 12 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Autumn
Last Name: Bernstein
Email Address: info@climateplan.org
Affiliation: ClimatePlan

Subject: Social Equity and SB 375 Implementation
Comment:

```
Please find the attached letter from ClimatePlan and 50 partner
organizations regarding social equity in SB 375 implementation.
```

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/37-carb_social_equity_letter_final.pdf

Original File Name: CARB Social Equity Letter_FINAL.pdf

Date and Time Comment Was Submitted: 2010-07-21 09:58:52

No Duplicates.

Comment 13 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Charles
Last Name: Ashley
Email Address: wattsvalleypreservation@gmail.com
Affiliation: Tehipite Chapter of the Sierra Club

Subject: SB 375 Regional Targets
Comment:

```
Please find attached my comments on the SB 375 Regional Targets.
Thank you,
Charles M. Ashley
Tehipite Chapter of the Sierra Club
```

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/39-comments_to_the_carb_on_sb_375_targets.doc

Original File Name: Comments to the CARB on SB 375 Targets.doc

Date and Time Comment Was Submitted: 2010-07-22 07:52:27

No Duplicates.

Comment 14 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Debbie
Last Name: Cox Bultan
Email Address: debbie@coastalhousing.org
Affiliation: Coastal Housing Coalition

Subject: SB375 Target for SBCAG
Comment:

The Coastal Housing Coalition (CHC) recently co-signed a letter with a number of Santa Barbara based organizations (dated June 23, 2010) expressing (1) our collective concern over the Santa Barbara County Association of Government's (SBCAG) initial calculations of possible strategies and potential emissions reductions as required by SB375, and (2) our collective hope that the California Air Resources Board would set an appropriate "ambitious yet achievable" greenhouse gas reduction target for Santa Barbara County.

On behalf of CHC's Board of Directors, I wanted to elaborate briefly on the Coastal Housing Coalition's specific concerns. According to the National Association of Home Builders, Santa Barbara County is the fifth least affordable small metropolitan area housing market in the nation. The Coastal Housing Coalition is a non-profit organization that represents thousands of workers (and the organizations who employ them) on the South Coast of Santa Barbara County who, because of the high cost of housing in our area, struggle to find adequate, affordable housing for themselves and their families. Even with the recent widespread decline in home prices, the vast majority of South Coast workers can't afford the median priced home; at the end of 2009, a family making the median income could afford a home priced at $430,000, yet the median home price on the South Coast was nearly $700,000. The consequence is that now fully one third of our local workforce – 30,000 people - commutes an average of 90 miles daily.

The jobs-housing imbalance impacts our community's economy, environment and civic life. In a recent study by the Santa Barbara County Workforce Investment Board (Sept 2009), over 65% of county employers listed issues related to housing, in terms of both retaining and recruiting employees, as their top workforce challenge. In our most recent survey of local employees, 44% of commuters said that they had to forgo serving on a non-profit board or committee and 40% said they weren't able to participate in their children's activities. And we know that the growing number of commuters is increasing our community's carbon footprint.

The lack of adequate and affordable housing for our area's workforce is a regional problem that demands a regional solution; it can't be solved by each jurisdiction working independently when so many county residents work and live in different communities. We hope that CARB will help provide a framework for SBCAG to address these critical issues on a regional basis by issuing an appropriate target, and allow our communities to come together and plan for our County's future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-22 13:56:35

No Duplicates.

Comment 15 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Matt
Last Name: Vespa
Email Address: mvespa@biologicaldiversity.org
Affiliation:

Subject: Center for Biological Diversity Comments on SB 375 Draft Targets
Comment:

```
Comments attached.
```

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/41-cbd_comments_sb_375_draft_regional_targets_7_23_10.pdf

Original File Name: CBD Comments SB 375 Draft Regional Targets 7 23 10.pdf

Date and Time Comment Was Submitted: 2010-07-23 10:19:26

No Duplicates.

Comment 16 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michael
Last Name: Bullock
Email Address: mike_bullock@earthlink.net
Affiliation:

Subject: BullockTargetEvaluationsRecommendationsStrategies
Comment:

Mike Bullock
mike_bullock@earthlink.net
1800 Bayberry Drive
Oceanside, CA 92054
July 21, 2010

Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, California 95814
SUBJECT: Comments on the Draft GHG Reductions, Pursuant to Senate Bill 375
Dear Air Resources Board Chair Mary Nichols and Members of the Board:
1.0 Introductory Comments
The time for debate has long since passed. The climate science is clear; we need to achieve significant GHG reductions today if we are to avert climate disaster in the future.
1.1 AB 32, SB 375, What Science Has Determined, and Current GHG Levels
AB 32 requires California emissions, from all sources, to be at 1990 levels by 2020. The years after 2020 are covered by a Governor's executive order. It calls for emissions to be 80% below 1990 levels, by 2050. These reductions, world wide, would limit GHG levels to 450 PPM.
When AB 32 and the executive order were formulated, it was thought that limiting GHG levels to 450 PPM would provide humanity adequate safety from catastrophic climate destabilization. However, climate science now tells us that any level above 350 PPM is dangerous. Unfortunately, the current level is 390 PPM, higher than it has been in over a million years.
SB 375 was written to give CARB authority over cars and light-duty trucks, sometimes referred to as personal driving. This personal driving is quantified as vehicle miles traveled, or VMTs. Personal driving is responsible 32% of GHG in California. In San Diego County, it is responsible for 41%. SB375 calls for CARB to give each regional government in the state (Metropolitan Planning Organization, or MPO) GHG reduction targets, for personal driving, for the years 2020 and 2035. SB375 requires that CARB give each MPO their targets by September 30th of this year.
SB375 also calls for an interim "bottoms up" process to produce CARB draft targets, at this time. That is the primary subject of this public review process. CARB is to consider what the MPOs modeled and submitted to CARB as "ambitious but achievable" targets and then submit draft targets to the MPOs.

1.2 Scoping Plan Observations

AB 32 gives CARB the responsibility of allocating reductions to the various sectors. In the “Scoping Plan”, adopted in December 2008, on page 17, CARB specified only 5 million tons per year as the reduction from “Regional Transportation-Related GHG Targets” by 2020.

The Plan added in a footnote, “This number represents an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. ARB will establish regional targets for each MPO region following the input of the Regional Targets Advisory Committee and a public consultation process with MPOs and other stakeholders per SB 375.

We note that the 5 million tons identified in Table 2 is in addition to the 31.7 million tons for Light-Duty Vehicle Greenhouse Gas Standards, including the implement of Pavley I standards and developing Pavley II standards, plus 15 million tons for the Low Carbon Fuel Standard.

1.3 Danger in “Bottom Up” Process of Identifying Draft Targets

In modeling “achievable” reductions, MPOs are free to ignore both the AB 32 legal requirements for reductions and the additional reductions needed for public health and safety, in light of our need to get GHG levels down to 350 PPM as soon as possible. Local politicians on MPO Boards may push for “path-of-least-resistance” strategies, hoping to sell these strategies to CARB as “aggressive but achievable”. Since government’s primary responsibility, at all levels, is public health and safety and since this responsibility extends from the three branches of state government down to all boards and agencies (most of which are extensions of the executive branch), it follows that the final GHG reductions must be based on what the climate scientists have determined is safe. Such reductions will significantly exceed those required by AB 32. It is certainly CARB’s responsibility to address this issue, even if it is in some other proceeding. Ignoring this issue is demonstrably criminally negligent, since it will lead to catastrophic climate destabilization, resulting in a significant die off of the human population.

1.3 Reducing GHG from Cars and Light-Duty Trucks

There are three things that will reduce GHG from driving. They are “clean cars”, “clean fuels” and less driving. “Clean cars” includes the benefits of more efficient gasoline and diesel powered cars, hybrids, and battery electric vehicles (BEVs). Since some of our cars will be BEVs, when CARB computes the overall average GHG per mile of our state’s fleet of cars, it must account for how much of our electricity is generated from fossil fuels. Most of our electricity will come from fossil fuels for many years, perhaps several decades. “Clean fuel” refers to fossil fuel formulated to have more hydrogen and less carbon, to result in less GHG emissions. “Clean fuel”, referred to as Low Carbon Fuel Standards (LCFS), is expected to provide a 10% emission reduction by 2020, but no more after that. This paper uses the LCFS factor of nine-tenths for both 2020 and 2035, even though this may be overestimating reductions in 2035 because the factor is inappropriate for BEVs and the number of BEVs could become significant by 2035.

For at least the next decade and perhaps much longer, less driving will be needed to provide the largest reduction in GHG, relative to current 2010 levels. However, relative to the SB 375 reference year of 2005, the “clean car” reduction will provide the largest decrease in GHG, for the target year of 2020.

These factors can be observed in Figure 1 of an analysis by S. Winkleman, based on CalTrans VMT forecast (red line), AB 1493 (“Pavley”, green line), and the Low Carbon Fuel Standard (LCFS,

purple line), compared with the AB 32 target of 1990 levels (light blue line). This Figure has been placed into this document for convenience. Note that the dark blue line, which combines all three factors, shows how the projected increase in VMT overwhelms GHG savings from cleaner fuels and vehicles. Decreasing VMT is the objective of SB 375.

2.0 Evaluation of CARB Draft Targets for 2020

The VMT reductions proposed by CARB for the MPOs, at this time, are shown in the Table 1.

It is important to note the implications of the Table 1 asterisked footnote and the fact that this target is per capita. It means that the calculation of GHG reduction estimates from this number requires the use of factors to account for population growth, the Pavley reductions ("Pavley"), and LCFS reductions, as shown below.

Note: to see this reports Tables and Figures, get the file I emailed to Earl Withycombe yesterday. There are tables and one important figure. Or email me with your request.

Table 1 Four Largest MPOs
Draft Greenhouse Gas Reduction Targets for 2020
(Percent Reduction in Per Capita Emissions Relative to 2005)*

MPO Regions	2020 Draft Targets
Metropolitan Transportation Commission (MTC)	
Sacramento Area Council of Governments (SACOG)	
San Diego Association of Governments (SANDAG)	
Southern California Association of Governments (SCAG)	
	5 - 10%

* Percent reduction numbers do not include emission reductions expected from Pavley Greenhouse Gas Vehicle Standards and Low Carbon Fuel Standard measures.

2.1 Adequacy, Compared to AB 32 Reductions

In order to estimate the 2020 outcome of the Table 1 reductions, the calculation must compare the net effect of above per capita reduction target, the increase in population, the Pavley reduction, and the Low Carbon Fuel Standard; with the 2005 levels. For the calculation, the following factors apply:

1. 0.95, for the per capita reduction in driving (using the lower, 5% value, from Table 1);
2. 1.196, for the 19.6% projected increase in population (based on California Dept. of Finance official projections) ;
3. 0.825, for the 82.5%, shown for 2020, on the green "Pavley" line of Figure 1;
4. 0.90, for the reduction in low-carbon fuel standard (LCFS), as shown on the purple line of Figure 1.

Multiplying these four factors together results in a factor of (.95)*(1.196)*(.825)*(.90) = 0.85.

This is a 15% reduction and so it barely passes the reduction that would be in line with AB 32, which is around 13%, as shown in the 1990 light-blue line on Figure 1, which is also the first yellow "X" on Figure 1.

Similarly, the 10% value results in factors of (.9)*(.825)*(.90)*(1.196) = .81. This is a 19% reduction and so it passes the reduction that would be in line with AB 32, which 13%, again, as shown in the 1990 light-blue line on Figure 1, which is also the first yellow "X" on Figure 1.

2.2 Need for "Pavley" and LCFS to Meet AB 32 Reductions

What is needed is a complete picture of what the various factors are providing and whether or not both "Pavley" and the LCFS are needed to get the reductions within the AB 32 level. Therefore Tables 2 through 7 have been computed and appear here.

Table 2 Factors Used to Estimate 2020 GHG Reduction from 2005, With a 5% Driving Reduction, from 2005

Table 3 Results of Combining Factors to Estimate 2020 GHG Reductions, With a 5% Driving Reduction from 2005

Table 4 Percent Reductions from Combining Factors to Estimate 2020 GHG Reductions, With a 5% Driving Reduction from 2005

Table 5 Factors Used to Estimate 2020 GHG Reduction from 2005, With a 10% Driving Reduction, from 2005

Table 6 Results of Combining Factors to Estimate 2020 GHG Reductions, With a 10% Driving Reduction from 2005

Table 7 Percent Reductions from Combining Factors to Estimate 2020 GHG Reductions, With a 10% Driving Reduction from 2005

It is therefore shown that both “Pavley” and the LCFS are needed to meet the AB 32 standards by 2020. This is true for both the -5% and the -10% reductions in VMT.

2.3 Conclusions Regarding 2020 Reductions, AB 32, & Reductions for Safety

For the 5% reduction, the following conclusions can be drawn. Both “Pavley” and the LCFS are needed to meet the AB 32 reduction. Assuming that both “Pavley” and the LCFS stay on track out to the year of 2020; there is still only a 2.6% margin, with respect to the AB 32 reductions. Since AB 32 is inadequate for the industrialized countries, when compared to the world-wide reductions needed to protect humanity from a catastrophic climate destabilization, the proposed reduction of 5% should probably be viewed as morally indefensible.

For the 10% reduction, the following conclusions can be drawn. Both “Pavley” and the LCFS are still needed to meet the AB 32 reduction. Assuming that both “Pavley” and the LCFS stay on track out to the year of 2020; there is a 7.1% margin, with respect to the AB 32 reduction. Since AB 32 is inadequate for the industrialized countries, when compared to the world-wide reductions needed to protect humanity from a catastrophic climate destabilization, the proposed reduction of 10% might still be morally indefensible.

3.0 Evaluation of CARB Draft Targets for 2035

Only the largest value shown, -19%, will be considered, for reasons that will become obvious, if it is not already obvious to the reader. Table 14 shows the proposed targets for the four largest MPOs in California.

Table 14 Four Largest MPOs
Placeholder Greenhouse Gas Reduction Targets for 2035
(Percent Reduction in Per Capita Emissions Relative to 2005)*

MPO Regions 2035
Placeholder
Targets

Metropolitan Transportation Commission (MTC) 3-12%
Sacramento Area Council of Governments (SACOG) 13-17%
San Diego Association of Governments (SANDAG) 5-19%
Southern California Association of Governments (SCAG) 3-12%

* Percent reduction numbers do not include emission reductions expected from Pavley Greenhouse Gas Vehicle Standards and Low Carbon Fuel Standard measures.

For 2035 it is necessary to extrapolate the Governor's Executive Order target, which is Figure 1's yellow line, out to year 2035. It is 0.87 in 2020 and it is 0.64 in 2030. Therefore, in year 2035, it will be
0.64 + [(.64 - .87)/(2030-2020)] * (2035-2030) = 0.525
Likewise, for 2035 it is necessary to extrapolate "Pavley", the green line, out to year 2035. It is 0.82 in 2020 and it is 0.73 in 2030. Therefore, in year 2035 it will be
0.73 + [(.73 - .82)/(2030-2020)] * (2035-2030) = 0.685
For the calculation, the following factors apply:
1. 0.81, for the per capita reduction in driving, using the 19% reduction from Table 14;
2. 1.402, for the 40.2% projected increase in population (based on California Dept. of Finance official projections) ;
3. 0.685, from the above-computed extrapolation of the green "Pavley" line of Figure 1;
4. 0.90, for the reduction in low-carbon fuel standard (LCFS), as shown on the purple line of Figure 1.
Multiplying these four factors together results in a factor of
(.81)*(1.402)*(.685)*(.90) = 0.700.
This is a 30.0% reduction, which is not even close to the required AB 32 reduction value of 47.5%, from the above-computed extrapolation of the Governor's Executive Order target fraction of .525.
This is a significant failure and indicates that neither the MPOs nor CARB are taking their climate crisis responsibilities seriously. It should be noted that although there is a chance that the Pavley reduction slope could be increased by a "Pavley 2" slope, it is also true that a poor economy and/or pure political "push back" could result in the current Pavley reduction slope becoming unobtainable sometime before 2035, such that the projected Pavley reduction factor of .685 would not be obtained. The forecasted "Pavley" reduction target depends on a certain level of fleet turnover, which has recently slowed down because of the recession. Thus we may not be able to depend on "Pavley".
Tables 15, 16, and 17 provide a complete picture of what the various factors are and how they fail to achieve the AB 32 reductions.
Table 15 Factors Used to Estimate 2035 GHG Reduction from 2005, With a 19% Driving Reduction, from 2005

Table 16 Results of Combining Factors to Estimate 2035 GHG Reductions, With a 19% Driving Reduction from 2005

Table 17 Percent Reductions from Combining Factors to Estimate 2035
GHG Reductions, With a 19% Driving Reduction from 2005

4.0 What 2035 Reduction Will Meet "AB 32" (Governor's Executive

Order) Reductions
The EXCEL spreadsheets that produced Tables 15, 16, and 17 were copied onto another sheet and then the VMT Per Capita Reduction value was increased by an integer amount until the net 2035 result was within the AB 32 target value. The result was -40 percent. The effect of the various factors is shown in Tables 18, 19, and 20.
Table 18 Factors Used to Estimate 2035 GHG Reduction from 2005, With a 40% Driving Reduction, from 2005

5.0 A Correct and Reasonable, Science-Driven "AB 32" Reduction
The Section 4 result of a 40% per-capita VMT reduction, required to meet the AB 32 target for year 2035, is a reasonable starting point. Given the uncertainty of the Pavley reduction by 2035 and the fact that climate scientists have shown that we need large reductions soon and need to be essentially off fossil fuels by 2050, a more reasonable reduction value for 2035 is a 50% reduction.
Results from this assertion are shown in Tables 21, 22, and 23.

Table 19 Results of Combining Factors to Estimate 2035 GHG Reductions, With a 40% Driving Reduction from 2005

Table 20 Percent Reductions from Combining Factors to Estimate 2035
GHG Reductions, With a 40% Driving Reduction from 2005

Table 21 Factors Used to Estimate 2035 GHG Reduction from 2005, With a 50% Driving Reduction, from 2005

Table 22 Results of Combining Factors to Estimate 2035 GHG Reductions, With a 50% Driving Reduction from 2005

Table 23 Percent Reductions from Combining Factors to Estimate 2035
GHG Reductions, With a 50% Driving Reduction from 2005

The percent margin below the AB 32 target is 9.3% (56.8-47.5). This corresponds to being nearly off carbon fuels by 2050, which is needed.
6.0 SCS Strategies that Can Do the Job
The MPO calculations and their implied requests, for no more than a 10% reduction in per capita driving by 2020 and no more than 19% by 2035, indicates that the MPOs are not seriously considering the root causes of the car-oriented California lifestyle that are caused by widespread government policies. SANDAG has never allowed such an in-depth process, let alone authorized it.
The exception is zoning to reduce sprawl. Incremental improvements in zoning, referred to as support for "smart growth", are taking place. Over time and to the extent the economy supports growth, this will yield driving reductions. However, fundamental changes in parking policy and road-use pricing, which are both related to the issue of congestion and freeway expansion, are never discussed in any depth. This oversight is reducing our chances of getting the strategies that will bring down rates of driving on the scale that is needed, for California to fully live up to its global warming responsibility and in a way that is equitable to all.
6.1 Road Use Fee Pricing Systems
A San Diego County newspaper, the North County Times (NCT), in a

February 9, 2009 article, reported that the Chair of the California Transportation Commission (CTC) wrote that the gas tax currently contributes nothing to road construction and only provides half of the money needed annually for repairs: http://www.nctimes.com/articles/2009/02/09/news/columnists/downey/z8591536f3e7332da882575510076fa1e.txt.

A Canadian company, Skymeter, is designing and installing a variable and comprehensive road-use fee pricing system, in the Netherlands by 2014 and in Denmark by 2016. The charge per mile will vary by such things as model of car, road, time of day, and congestion level. In 2005, the gas tax in the Netherlands was equivalent to $3.50 per gallon. However, with the advent of the new system, the Netherlands will eliminate the gas tax. Nevertheless, the Netherlands estimates that the GHG from driving will drop by 10%. Note that such a system could easily charge a price of zero cents per mile for a low-income driver. Our current system of a gas tax has no such capability. Skymeter will program the navigational-unit-like box so that no travel information is stored, to protect driver privacy.

On July 11th 2009, the California Nevada Regional Conservation Committee (CNRCC) of the Sierra Club California passed a resolution supporting a “Comprehensive Road Use Fee Pricing System”. This paper can be provided upon request.

The CNRCC resolution is supported by a 10-Page “Reference Document” that outlines the principles and conditions of a road-use fee pricing system that would conform to Sierra Club values. It has an example of a road-use fee structure that supports the listed principles. Useful background information is also provided.

On November 14th, the Environmental Caucus of the California Democratic Party (CDP) passed a 1-page resolution in support of a “Comprehensive Road-Use Fee Pricing System”. This one-page resolution contains the following words.

THEREFORE, BE IT RESOLVED, that the California Democratic Party* supports a state-funded study of a design of a road-use fee pricing system that (1) would pay for all road-use costs including the environmental and health costs caused by driving, (2) could still include a fuel tax or fee, (3) would mitigate impacts on low-income users and protect privacy, (4) would include congestion pricing when that technology becomes feasible, (5) would keep the per-mile price incentive to drive energy-efficient cars at least as large as it is with today’s fuel excise tax, and (6) could be accompanied by tax reductions sized to achieve either net-revenue neutrality or near-net-revenue neutrality.

*Not true because the resolution failed in the CDP Resolution Committee

The Nevada Department of Transportation is taking comments on a proposal for a VMT fee to replace their gas tax, as shown at http://www.vmtfeenv.com/.

The 2010 Platform of the California Democratic Party (at http://www.cadem.org/atf/cf/%7BBF9D7366-E5A7-41C3-8E3F-E06FB835FCCE%7D/Platform2010CDP_FINAL_June.pdf), inspired in part by the 1-page resolution identified above, contains that following bullet:

• Work for equitable and environmentally sound road and parking use

Using sales taxes, property taxes, income taxes, and other general taxes pay for services that make it artificially cheap to drive is unjust to citizens that drive less than average. There is no reason why government should adopt policies that increase driving and economically discriminate against those that telecommute, walk, bike, car pool, or use transit; the unconstitutionality of the current system is plain to see.

Considering all of this information, CARB has a responsibility to notify the Governor and our legislative leaders that our state has good reasons to implement a comprehensive and variable road-use fee pricing system. There is probably no reason to reinvent the wheel. The Skymeter system would work fine here in California. The Sierra Club California analysis can be considered to ensure an implementation that is both equitable to all and environmentally sound.

6.2 Unbundling the Cost of Car Parking

For the vast majority of destinations in California, the cost of car parking is hidden within other costs. This has serious consequences. For example, at most places of employment, parking costs reduce the wages that can be paid to all the employees, even those that never use the parking. Similarly, at many apartment complexes, bundled parking costs increase the rent and this is true, even for families that do not own a car. Bundled parking costs routinely increase the costs of goods, such as groceries, for all customers. Again, this is even true for those that do not drive. Since governments require businesses to provide minimum levels of parking, they are involved in this economic discrimination towards those that drive less.

Driving less is, to some degree, a lifestyle choice. Since government has no valid reason to encourage driving, the lifestyle choice of less driving deserves constitutional, or at least legal, protection from any practices that discriminate against it, economically. So far, this agency (CARB) has not taken an active role in pushing vmt and parking pricing.

On June 22nd (2010), I presented a paper on how parking could be operated to unbundle parking costs in a way that supports the sharing of parking. This was at the 101st Conference and Exhibit of the Air and Waste Management Association, in Calgary, Canada. The session, Sustainable Land Use and Transportation, included my paper, A Plan to Efficiently and Conveniently Unbundle Car Parking Costs, which was well received.

My paper is therefore both peer reviewed and published. I would be pleased to present this paper to the staff of CARB, in the hopes that CARB could bring about equitable and environmentally-sound parking policies to California.

The following points, taken from the paper, apply.

• Vehicle miles traveled (VMT) are a major cause of global warming and pollution.

• California’s Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035.

• The appropriate pricing of parking is one of the least costly tools documented to reduce VMT.

• New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.

• Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.

• Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.

• Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.

• Good policies will eventually let cities turn parking minimums

into parking maximums.
Less land and resources devoted to parking will support mixed use and make “smart growth” more economically viable. It should therefore be a key ingredient supporting the MPO’s stated desire to foster “smart” growth, where “smart” should be defined as “less VMT”.

Here is a copy of the abstract of the paper.
The Introduction shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called “Intelligent Parking,” will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a “Request for Proposal” (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of Intelligent Parking. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of Intelligent Parking are listed. Eleven definitions and concepts, that together define Intelligent Parking, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% (“Congestion Pricing”). An implementation strategy is described.
This abstract aroused enough interest among those responsible for A&WMA’s Sustainable Land Use and Parking session that they requested that I submit a manuscript, which was ultimately selected to become part of the written Conference Proceedings and for presentation. I hope that it will similarly arouse the interest in the CARB Board and staff. CARB needs to consider working to execute the implementation strategy described in A Plan to Efficiently and Conveniently Unbundle Car Parking Costs. I would be honored to help in any way possible.

6.3 SANDAG Board’s Failures Regarding Climate Change

SANDAG’s 2007 RTP, “RTP2030”, called for increasing the number of freeway lanes by 38%. This would be in a region that already had one of the highest VMT-per-capita metrics in the state. SANDAG also supported a sales tax measure, “TRANSNET”, that was advertised as one that would spend two-thirds of its money on roads and one-third on transit. However, after it was passed, SANDAG defined all HOV lanes to be “transit”, thereby significantly reducing the fraction of money spent on true transit.

Out of a $57 billion dollar budget for RTP2030, SANDAG budgeted about 1% for mitigation. This mitigation is split evenly between “smart growth” incentive money and a Regional Bicycle Plan. They have published a Smart Growth Incentive Plan, a Smart Growth Design Guideline, as well as the Regional Bicycle Plan. SANDAG has an excellent staff. However, the Board does not provide helpful direction. One obvious direction needed was to adopt a metric of reducing VMT to decide what “smart growth” should get funding, what “smart growth” design guidelines should be adopted, and what bicycle programs should be funded. They were asked repeatedly to put citizen comments, directed toward the early drafts of these documents, on line, to be viewed by all. Not doing this made it easy for the staff to ignore significant public comment and to instead follow the direction provided by the Board, which seemed to think that bike money should go mostly for trails and smart-growth money should go toward beautification projects in areas deemed suitable for smart growth. If less driving were used as a criteria for spending money, then funding the League of American Bicyclist’s

class on how to ride a bike in traffic and the development of equitable and environmentally sound parking policy (good enough to be politically acceptable), would have been a large part of the spending. Instead, bicycle education and car-parking policies were marginalized to the point of being essentially unfunded.

6.4 Putting a Stop to Freeway Expansion

One of the most powerful strategies to reduce GHG would be to stop expanding freeways. Instead of costing money, it would generate money. It is well understood that the metric of freeway-lane miles per square mile of developed land increases an area's average car-trip length and thereby increases VMTs. SANDAG is ignoring this fact and this is probably one of the primary reasons that its 2035 GHG Reduction Target is unacceptably small. When the SANDAG TRANSNET tax was passed, few voters understood that we were threatened with a climate catastrophe and that our responsibility was to drive significantly less. Given our current understanding, SANDAG has a responsibility to go back to voters with a ballot measure that reconfigures TRANSNET to be 100% for transit, bicycles, and pedestrians.

The current freeway-widening project being considered is to widen I-5 from 8 to either 12 or 14 lanes, from La Jolla to Camp Pendleton, at a cost of over $4 billion dollars. The DEIR was released in early July. Caltrans is holding public meetings, where no member of the public is allowed to speak publicly. It sent postcard notifications to those living along the route. However, instead of honestly notifying the recipients of the radical, land-consuming nature of the proposal, these postcards only refer to a "managed lane project". Who would be worried about some plan to manage lanes? Nowhere on the postcard is there any information suggesting a wider freeway, a taking of land, a reducing of property-tax rolls, an increase in noise, an increase in driving, an increase in air pollution, an increase in GHG or even that there is any kind of construction project being proposed.

7.0 Conclusions

Targets will have to be more stringent than AB 32 targets if we are going to fulfill our world leadership responsibility, as required, to give the world a chance at avoiding climate destabilization. The 2020 Target of -10% (per-capita from VMT) can only result in an SB-375 AB 32 reduction if both "Pavley" and the LCFS factors are used. The 2035 reduction target of -19% would have to instead be 40% to just meet the AB 32 reductions, and this is assuming the Pavley reductions continue on the "Pavley 1" trajectory all the way to 2035. This assumption about "Pavley" may be overly optimistic. The science-supported 2035 reduction is 50%.

The best, largely overlooked strategies to reduce VMT are a comprehensive and variable road use fee pricing system, as is being installed by Skymeter; unbundling the cost of car parking; and putting a stop to all freeway expansions. I would like to discuss further a state-wide strategy to unbundle the cost of car parking.

Sincerely yours,

Mike Bullock
mike_bullock@earthlink.net
760-754-8025
1800 Bayberry Drive
Oceanside, CA 92054

Original File Name: BullockToCARB3.doc

Date and Time Comment Was Submitted: 2010-07-23 16:59:43

No Duplicates.

Comment 17 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Bob
Last Name: Keenan
Email Address: biabob@hbatk.com
Affiliation:

Subject: SB 375 target ws comment letter
Comment:

thank you

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/43-ca_metro_forecast_july2010.zip

Original File Name: CA_Metro_Forecast_July2010.zip

Date and Time Comment Was Submitted: 2010-07-26 14:56:11

No Duplicates.

Comment 18 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Gerald
Last Name: Cauthen
Email Address: Cautn1@aol.com
Affiliation:

Subject: Meeting State GHG Emission Reduction Targets - CARB's Role
Comment:

Dear Mr. Ito,

First, I want to commend you for running a first rate public meeting in Oakland last week. Your willingness to give people an opportunity to express themselves, and to listen attentively, was a refreshing change from what Bay Area residents usually encounter in such meetings.

Following are a few thoughts in addition to those recently forwarded to Ms. Nichols (letter attached).

As I noted in the letter and in testimony, people will not reduce their driving unless a viable non-automotive alternative is in place. While this seems obvious, it is a factor that is often neglected, particularly by those focused only on serving low-income and minority people. When too many cars clog Bay Area streets and highways everyone…including the transit-dependent… loses.

After four decades of rhetoric about returning to a more balanced Bay Area transportation system, our public transit systems remain poorly connected and otherwise deficient. Given the Region's dismal transportation history, it is clear that the situation will not "self-correct". Significant outside pressure from CARB and the State of California will be required to bring about needed transportation changes in the Greater Bay Area.

Following are a few of the gaps and inefficiencies that are evident in the Region's existing network of bus and rail lines. With determination and commitment, these deficiencies could be eliminated in a timely manner.

· San Francisco's Muni Metro system is currently operating at far below capacity, thereby deterring thousands of would-be

riders a day because of excessive crowding during rush hours,

· When completed the Caltrain extension to San Francisco's new Transbay Terminal will quickly render that facility the most important nexus of transit systems west of New York City. Yet the Caltrain extension is habitually subordinated to a politically-inspired, virtually useless short bit of subway extended a third of the way into Chinatown.

· To complete the connection between the buses and trains accessing the new Transbay Terminal and the Market Street subways, underground moving ramps linking the new terminal to the mezzanine level of the Embarcadero BART Station are planned. However the importance of this vital pedestrian link continues to go largely unrecognized, and the underground connection consequently languishes for a lack of funds,

· Another way of giving San Francisco-bound commuters from San Mateo County an alternative to driving would be to route SanTrans buses along Market Street instead of along Mission,

· A BART/Amtrak transfer station in West Oakland would dramatically improve the rail connection between points along the I-80 Corridor, downtown Oakland and downtown San Francisco. By attracting I-80 users away from the freeway and onto a more efficient rail system, this connecting station would ease pressures on San Pablo Avenue, an important transit street, which gets inundated with I-80 overflow traffic every time the freeway gets stacked up,

· Passenger rail service extended across a new Dumbarton Rail Bridge would provide a much needed and long-delayed second Bay rail crossing,

· For almost 40 years there has been talk of creating a regional bus service to take people where the trains doesn’t go. The Region is still waiting for this service,

· Large employers located in spread out employment “campuses” should sponsor free shuttle bus service to and from nearby transit nodes. There has been progress in this area; more is needed,

· Buses and light rail vehicles crowded with patrons should operate on transit-only lanes, at least during the morning commute period,

· Transit working rules must be formulated in a manner designed to foster consistently reliable transit service,

· An independent operational and marketing analysis of the AC Transit system would bring about a major increase in AC Transit ridership,

The above are typical of the type of change that is badly needed in the Bay Area. If public transit were rendered sufficiently reliable and appealing, it would cause motorists to leave their cars at home, at least some of the time.

Sincerely yours,

Gerald Cauthen, PE

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/44-ltr_to_carb_july_0910.doc

Original File Name: Ltr to CARB July 0910.doc

Date and Time Comment Was Submitted: 2010-07-27 07:34:16

No Duplicates.

Comment 19 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michael
Last Name: Chiacos
Email Address: mchiacos@cecmail.org
Affiliation:

Subject: CEC more detailed comments on SBCAG's analysis
Comment:

Hello Doug and Terry,

We really enjoyed the SB 375 workshop in Ventura today, thank you so much for giving the community an opportunity to engage in the process.

I've attached CEC's more detailed comments on SBCAG's analysis here (sorry, our PDF maker is having a problem so they are in two files….) As you can see, there are many areas where SBCAG's analysis had serious flaws. We hope that ARB will take these concerns into mind when issuing a final recommendation on SBCAG's target.

Please confirm you received this and let me know any thoughts you may have on our comments.

Sincerely,

Michael

Michael Chiacos
Energy Program Transportation Specialist
Community Environmental Council
Santa Barbara, CA

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/45-cec_comments.zip

Original File Name: CEC Comments.zip

Date and Time Comment Was Submitted: 2010-07-27 07:41:23

No Duplicates.

Comment 20 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Harvey
Last Name: Eder
Email Address: harveyederpspc@yahoo.com
Affiliation: Public Solar Power Coalition

Subject: A PATH TO SUSTAINABLE ENERGY BY 2030 PSPC
Comment:

CARB AB375 Staff & Board,

The sun is the engine of our ecosystem. It makes the wind blow, the water flow, and the plants grow, or it can be used directly. It's the way the world works.
Attached is the cover article from Scientific American Nov. 2009 A Path To Sustainable Energy by 2030,which includes reference to a study converting California to solar renewables by 2020 by 2 Ca. Profs, Mark Jacobson, Stanford, and Mark Delucci,U.C. Davis. This information is now officially part of the record, and SB375 MPO and Cities and Countys in California as well as SEP, and IEPR should include immediate total solar conversion plans. RES has been delayed for 2 months because the Governor wrote that legislation may be passed and signed into law by Sept 23,2010 to work toward solar conversion.

Thank you, Solarly
Harvey Eder Ex. Dir. PSPC
Public Solar Power Coalition
(310) 3932589
1218 12th St. #25
Santa Monica, Ca. 90401
harveyederpspc@yahoo.com

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/46-a_path_to_sustainable_energy_by_2030.docx

Original File Name: A PATH TO SUSTAINABLE ENERGY BY 2030.docx

Date and Time Comment Was Submitted: 2010-07-27 10:47:53

No Duplicates.

Comment 21 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Steve
Last Name: Raney
Email Address: cities21@cities21.org
Affiliation: Cities21

Subject: SB375 Target Setting
Comment:

```
1. MTC/ABAG are overly-pessimistic about the efficacy of aggressive
pricing, contradicting more optimistic Moving Cooler results.
2. The baseline carbon reduction forecast for AB 1493 (Pavley) and
Low Carbon Fuels assumes that things will go smoothly, an
unrealistic assumption. This forecast should be reduced to reflect
more skepticism.
3. It is unfortunate that MTC/ABAG chose politically improbable
aggressive pricing strategies, rather than politically viable,
negative-cost alternatives that provide similar VMT reduction. A
policy comparison table is provided.
4. TDM is more of an essential response to aggressive pricing,
rather than being a separate generator of reduced VMT.
5. If 2035 AB32 targets will not be met (60% of 1990), develop a
"meet the 2035 AB32 target" scenario.

Please see attached PDF for details
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/47-cities21_sb375_comment_revb.pdf

Original File Name: Cities21_SB375_comment_RevB.pdf

Date and Time Comment Was Submitted: 2010-07-27 16:09:42

No Duplicates.

Comment 22 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michael
Last Name: Bullock
Email Address: mike_bullock@earthlink.net
Affiliation: TransportationChairSanDiegoSierraClub

Subject: Sierra Club California's Support For Improved Parking Policies
Comment:

For decades, the Sierra Club has favored elimination of subsidies for parking, as shown in http://sierraclub.org/policy/conservation/trans.aspx

On July 24, 2010 Sierra Club California passed the following resolution regarding parking:

More Equitable and Eco-Friendly Car Parking Policy

Proposed Resolution for CNRCC July 24, 2010, Prepared June 16, 2010 by Energy-Climate Committee

Contact: Mike Bullock, CNRCC Energy-Climate Committee: 760-754-8025, mike_bullock@earthlink.net.

RESOLUTION: Sierra Club California supports equitable changes in parking policies to reduce vehicle miles traveled (VMT) and greenhouse gas emissions. Some methods include eliminating or reducing minimum parking requirements (in off-street parking ordinances and any land use actions), unbundling car parking costs, operating shared parking, and congestion pricing. Policies must protect the privacy of drivers, consider disabled and low-income drivers, and protect the public’s right to access public lands and, within the coastal zone, visitor serving facilities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-27 17:49:09

No Duplicates.

Comment 23 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michael
Last Name: Bullock
Email Address: mike_bullock@earthlink.net
Affiliation: TransportationChairSanDiegoSierraClub

Subject: ComprehensiveRoadUseFeesToReduceVMTsWhileStillEncouragingEfficientVehicles
Comment:

CARB needs to work for a more equitable approach to road use funding. By giving people more choice over how they spend their own money for transportation, they will choose to drive less. The Chair of the California Transportation Commission has written that gas taxes now pay almost nothing towards new construction costs and only cover about half of road maintenence costs. Pavley 1 and 2 are mandating that every year less money will go into our gas tax accounts per mile driven. These facts mean that our state must reconsider road use pricing. This is crucial if we are to have any chance against global warming. If we love our grandchildren, it is time to be brave and tell the truth. The following facts should help you see your way toward constructive action.

1.) On July 11, 2009, Sierra Club California passed the following resolution:

The California Nevada Regional Conservation Committee of the Sierra Club hereby augments its current support for increasing the state gas excise tax by supporting a comprehensive road-use fee pricing system including environmental and health costs. The pricing system, which could still include a gas tax, must mitigate impacts on low-income users and protect personal privacy.

2.) On November 14th, 2009, the Environmental Caucus of the California Democratic Party passed a resolution that contained the following words:

THEREFORE, BE IT RESOLVED, that the California Democratic Party supports a state-funded study of a design of a road-use fee pricing system that (1) would pay for all road-use costs including the environmental and health costs caused by driving, (2) could still include a fuel tax or fee, (3) would mitigate impacts on low-income users and protect privacy, (4) would include congestion pricing when that technology becomes feasible, (5) would keep the per-mile price incentive to drive energy-efficient cars at least as large as it is with today’s fuel excise tax, and (6) could be accompanied by tax reductions sized to achieve either net-revenue neutrality or near-net-revenue neutrality.

3.)Skymeter, a Canadian company is designing and installing a variable and comprehensive road use fee, to replace the gas tax, in the Netherlands by 2014 and Denmark by 2016. This is estimated to decrease GHG by 10% in the Netherlands, even though the gas tax that will be dropped is equivalent to $3.50 per gallon. Skymeter would be glad to install such a system in California and could get

this done well before 2020.

4.) It should be noted that in all these cases, it will cost a lot more per mile to drive a Hummer than it will to drive a Prius.

5.) For more detail on what a comprehensive road-use fee pricing system would look like, I have attached the so called "Reference Document" that was considered an example and was in fact referenced in the background material of the July 11th, 2009 "Comprehensive Road-Use Fee Pricing System" that was passed by Sierra Club California and is shown in Item 1 above.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/49-resolutionreferencedocument.doc

Original File Name: ResolutionReferenceDocument.doc

Date and Time Comment Was Submitted: 2010-07-27 18:05:34

No Duplicates.

Comment 24 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Georgette
Last Name: Gomez
Email Address: GeorgetteG@environmentalhealth.org
Affiliation: Environmental Health Coalition

Subject: San Diego GHG Targets and Implementation Plan
Comment:

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Attach you will find Environmental Health Coalition response to a
strong targets for GHG reductions under SB 375.
Thank you,
Georgette Gómez
```

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/51-carb_ghg_targets_for_sb_375_signed_copy.pdf

Original File Name: CARB GHG Targets for SB 375 signed copy.pdf

Date and Time Comment Was Submitted: 2010-07-29 13:38:54

No Duplicates.

Comment 25 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Lee
Last Name: Moldaver
Email Address: audubon@rain.org
Affiliation:

Subject: Thank U 4 SB 375 Ventura workshop
Comment:

Dear Terry,

Thanks again for holding the public workshop in Ventura last Friday.

Those of us from Santa Barbara County public agencies and ngos found
it valuable and informative.

Please DO consider requesting our MPO (Santa Barbara County Association
of Governments) to take on some kind of responsibility and role right now,
not at the next juncture.

We have a fine staff, but they work for a short-termer mindset CAG board.
Without a nudge, the latter will direct the former to do the minimal in
cost or effort to qualify for SB 375, and nothing more.

We can, and should, try to do more. Everyone should.

Thanks again for running a smooth, welcoming workshop.

Lee Moldaver, ALE
Santa Barbara

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-29 13:46:27

No Duplicates.

Comment 26 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Matt
Last Name: Mogensen
Email Address: matt.mogensen@fountainvalley.org
Affiliation: City of Fountain Valley

Subject: City of Fountain Valley SB 375 Targets Comment Letter
Comment:

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Please find the attached comment letter from Mayor Larry Crandall.
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/53-fountain_valley_sb_375_greenhouse_gas_target_comment_letter_7.29.10.pdf

Original File Name: Fountain Valley SB 375 Greenhouse Gas Target Comment Letter 7.29.10.pdf

Date and Time Comment Was Submitted: 2010-07-29 19:29:40

No Duplicates.

Comment 27 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Keith
Last Name: Wagner
Email Address: execdirector@ecosacramento.net
Affiliation: Environmental Council of Sacramento

Subject: ECOS Comments on Proposed SB 375 Regional Targets (text and PDF format)
Comment:

The Environmental Council of Sacramento ("ECOS") appreciates the work done by the California Air Resources Board ("CARB") to date to implement SB 375. However, it has recently become clear to us that the currently proposed "regional targets" for vehicle miles traveled ("VMT") related greenhouse gas ("GHG") reductions may be too low, and, therefore, may be insufficient to actually implement the Legislature's intent in enacting SB 375, which was to decrease VMT-related GHG emissions going forward.

Specifically, ECOS is concerned that the currently proposed "per capita" emissions reduction targets have not adequately been explicated or explained in the context of anticipated population growth in the state. ECOS recognizes that SB 375 specifically allows the targets adopted by CARB to be specified on a "per capita" basis. However, that should not be interpreted to undermine the fundamental purpose of SB 375, which is to reduce (not merely attenuate increases in) VMT-related GHG emissions going forward.

The targets that are currently under consideration propose a 5-10% reduction in per capita VMT emissions by 2020, with 2005 as a base year. However, California's population is expected to grow by considerably more than 5-10% over that same time period. Accordingly, it appears that all of the recommended targets (when factored with expected population growth) will actually result in more VMT-related GHG emissions, albeit less than in the Business-As-Usual scenario. Accordingly, ECOS requests that CARB at least develop, disclose and put on the table for consideration, alternative targets that would keep pace with projected population growth to achieve actual, overall reductions in VMT-related GHG emissions.

ECOS recognizes and agrees that reducing VMT-related GHG emissions through smart land use planning is necessary for the success of the Global Warming Solutions Act of 2006 (AB 32). Implementation of SB 375 is a critical component in achieving AB 32's lofty goals. However, to do so, SB 375 targets must be set that support and enhance, rather than erode and compromise, the state's achievements in other vehicle-related GHG reduction efforts (i.e., changes in fuels and fleet). With regard to this point, SB 375 has often been referred to as one "leg" of a "three-legged stool." ECOS would observe that a three legged stool with two legs that reach the ground (GHG reductions related to fuels and fleet), and a third that does not (SB 375 targets that increase VMT-related GHG emissions), is hardly a stable platform for achieving AB 32's

purposes.

ECOS' concern is further underscored by the fact that, in enacting SB 375, the Legislature made a policy "trade off," allowing exemptions under the California Environmental Quality Act ("CEQA") for specified project that are consistent with an adopted "Sustainable Community Strategy" ("SCS") meeting CARB's adopted SB 375 targets. The irony of the currently proposed per capita targets is that the state's Metropolitan Planning Organizations ("MPOs") will be authorized to adopt SCSs that will actually increase VMT-related GHG emissions, yet specified projects under the SCS will be granted relief or exemption from CEQA provisions for environmental protection, public disclosure or informed decision-making. Allowing projects under an SCS that will increase VMT-related GHG emissions to avoid CEQA's environmental review and mitigation requirements would appear to undermine both the Legislature's intent in enacting SB 375 as well as broader environmental protection efforts in the State.

ECOS is also very concerned that the RTAC and CARB have proposed to adopt targets requiring no VMT-related GHG emission reductions at all for several of the smaller MPO's in the state. Put simply: if these MPO's are going to be allowed to conduct business as usual and do nothing to contribute toward SB 375's goal of reducing VMT-related GHG emissions, why should they be granted CEQA exemptions under SB 375?

ECOS is similarly concerned about the extremely low targets that have been proposed for certain regions of the state, such as the San Joaquin Valley. The result of such lax targets may well be the exact opposite of CARB's intent: providing unintended incentives to shift and intensify regional growth pressures and increase urban sprawl in an area of the state that can least afford the air quality impacts, while concurrently providing CEQA streamlining and exemptions to the projects that will cause those same, adverse air quality impacts.

ECOS does recognize that the proposed draft targets incorporate perceived fiscal, infrastructure and other constraints. ECOS urges CARB not to measure the "feasibility" of its SB 375 targets based on the ability of every MPO in the state to adopt an SCS, however, because that is not what the Legislature intended. SB 375, by also expressly providing for the adoption of Alternative Planning Strategies ("APS"), demonstrates the Legislature's understanding that, to achieve real VMT-related GHG reductions, the targets may have to be set too high for SCS's to be adopted by the MPOs. By defining "feasible" to mean that the targets must be set low enough for all MPOs to adopt an SCS, CARB would be ignoring the statute's provisions for the adoption of APS's, where an MPO finds itself unable to formulate an SCS that would achieve actual VMT-related GHG emissions reductions.

Absolute emissions reductions must be at least considered and addressed in the final SB 375 targets release, to fulfill the SB 375 charge of achieving VMT-related GHG emissions reductions. Moreover, SB 375's land use emissions reductions strategies are long-term, requiring that the targets be revisited and updated every four years – potentially allowing future targets to achieve what CARB decides near-term targets cannot. Accordingly, ECOS requests that the public release of the MPOs' targets expressly disclose and address the per capita targets that would be required to reduce VMT-related GHG emissions, so that, at a minimum, the

issue is squarely on the table for future SB 375 target updates.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/54-draft_targets_release_comments_july_2010_-_final.pdf

Original File Name: Draft Targets Release Comments July 2010 - FINAL.pdf

Date and Time Comment Was Submitted: 2010-07-30 14:12:35

No Duplicates.

Comment 28 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Karen
Last Name: Brindley
Email Address: kbrindley@ci.san-marcos.ca.us
Affiliation: City of San Marcos

Subject: SB 375 Draft GHG Targets
Comment:

The initial 5-19% Greenhouse Gas (GHG) target placeholder for the years 2020 and 2035 was established by SANDAG and provided to the CARB. This placeholder was established by SANDAG modeling scenarios that included very aggressive, unapproved, and unfunded policies and infrastructure improvements through the year 2035. The approved Regional Transportation Plan has a horizon year of 2030, however, SB 375 requires a horizon year of 2035. Therefore, the SANDAG region has a period of five years wherein future transportation planning and investments are not approved, yet for the purposes of SB 375 must be analyzed for VMT reduction.
The initial 5-19% GHG reduction scenarios included both current and future sources of transportation revenue that may not be available; and also included land use intensification assumptions that have not been approved by the Board of Directors or by the local jurisdictions. SANDAG provided a letter to CARB (dated June 4, 2010) which indicated that the SANDAG Board of Directors expressed concern that the scenario modeling assumed an intensification of land use as well as policies, programs, and investments that were not constrained by actual revenue that will be available when the Board prioritizes investments as part of the next Regional Transportation Plan.
It should be noted that SANDAG has an adopted 2030 Regional Transportation Plan that includes two funding scenarios, the "Revenue Constrained" scenario (identifying traditional funding sources) and the "Reasonably Expected Revenue" scenario (which includes both current funding sources and potential future revenue sources from state and federal sources). At the direction of the SANDAG Board of Directors, a hybrid scenario was developed and the SANDAG Board of Directors has recommended to CARB a target of 7% reduction by 2020 and 13% by 2035.
Assumptions contained within the hybrid scenario include highway improvements that are within the 2030 Revenue Unconstrained highway network as well as revenue unconstrained number of park and ride parking spaces. Without an actual funding source these improvements and realization of GHG reduction targets may not be realized. There are also a number of very aggressive increases to carpool and vanpool participants within the Systems Efficiency scenario that may not be realized. Given the CARB has indicated the GHG targets should be "ambitious but achievable", these targets may not be realized or achieved given that some of the assumptions in the model include unfunded improvements and investments into the transportation network.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-30 16:15:49

No Duplicates.

Comment 29 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Connie
Last Name: Gallippi
Email Address: connie@csgcalifornia.com
Affiliation: California Infill Builders Association

Subject: Draft SB 375 Targets Comment Letter
Comment:

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Attached please find a comment letter from the California Infill
Builders Association to the California Air Resources Board
regarding the Draft SB 375 targets.
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/56-infill_builders_sb_375_draft_targets_7.30.10.pdf

Original File Name: Infill Builders_SB 375 draft targets_7.30.10.pdf

Date and Time Comment Was Submitted: 2010-07-30 16:35:44

No Duplicates.

Comment 30 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michelle
Last Name: Garcia
Email Address: airquality@fmms.org
Affiliation: Fresno Madera Medical Society

Subject: Doctor's Testimony
Comment:

Attached are comments from the SB375 Regional Workshop in Fresno on June 22, 2010. These comments are being submitted on behalf of the District 6 Delegation of the California Medical Association consisting of 8 Medical Societies in the San Joaquin Valley (Kern, Kings, Tulare, Fresno-Madera, Merced-Mariposa, San Joaquin, Stanislaus and Tuolumne).

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/58-aq_dir_testimony_for_district_6.doc

Original File Name: AQ Dir Testimony for District 6.doc

Date and Time Comment Was Submitted: 2010-08-02 14:22:30

No Duplicates.

Comment 31 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Michael
Last Name: Delollis
Email Address: airquality@fmms.org
Affiliation: Fresno Madera Medical Society

Subject: Doctor's Testimony
Comment:

Attached are comments from the SB375 Regional Workshop in Fresno on June 22, 2010. These comments are being submitted on behalf of the District 6 Delegation of the California Medical Association consisting of 8 Medical Societies in the San Joaquin Valley (Kern, Kings, Tulare, Fresno-Madera, Merced-Mariposa, San Joaquin, Stanislaus and Tuolumne).

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/59-delollis_testimony.doc

Original File Name: Delollis testimony.doc

Date and Time Comment Was Submitted: 2010-08-02 14:27:19

No Duplicates.

Comment 32 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Don
Last Name: Gaede
Email Address: airquality@fmms.org
Affiliation: Fresno Madera Medical Society

Subject: Doctor's Testimony
Comment:

```
Attached are comments from the SB375 Regional Workshop in Fresno on
June 22, 2010.  These comments are being submitted on behalf of the
District 6 Delegation of the California Medical Association
consisting of 8 Medical Societies in the  San Joaquin Valley (Kern,
Kings, Tulare, Fresno-Madera, Merced-Mariposa, San Joaquin,
Stanislaus and Tuolumne).
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/60-gaede_testimony.doc

Original File Name: Gaede Testimony.doc

Date and Time Comment Was Submitted: 2010-08-02 14:28:29

No Duplicates.

Comment 33 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Oscar
Last Name: Sablan
Email Address: airquality@fmms.org
Affiliation: Fresno Madera Medical Society

Subject: Doctor's Testimony
Comment:

Attached are comments from the SB375 Regional Workshop in Fresno on June 22, 2010. These comments are being submitted on behalf of the District 6 Delegation of the California Medical Association consisting of 8 Medical Societies in the San Joaquin Valley (Kern, Kings, Tulare, Fresno-Madera, Merced-Mariposa, San Joaquin, Stanislaus and Tuolumne).

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/61-sablan_testimony.doc

Original File Name: Sablan Testimony.doc

Date and Time Comment Was Submitted: 2010-08-02 14:29:23

No Duplicates.

Comment 34 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Dr. Terry
Last Name: McKittrick
Email Address: lkimura@arb.ca.gov
Affiliation:

Subject: Help Local Governments Improve Air Quality and Public Health
Comment:

Aug 1, 2010

Chairman Nichols
1001 I Street
Sacramento, CA 95812

Dear Chairman Nichols,

I encourage the California Air Resources Board to pursue vigorous implementation of SB 375 (Steinberg). This law will help California lead the way in the implementation of "smart growth" economic development policies that promote healthier communities and reduce harmful air pollutants and greenhouse gases. SB 375 does this by encouraging improved land use and transportation planning and alternatives to driving, including:

*neighborhood reinvestment and redevelopment
*more robust and effective transit programs
*more walkable, compact communities connected by transit
*community design and infrastructure that supports walking and biking

We know these programs will lead to a smart economic development policy at the same time that they generate excellent health benefits and address global warming with more jobs, cleaner air, and less time in traffic. These should be priority goals in California.

Sincerely,

Dr. Terry McKittrick
359 Village Dr
Dinuba, CA 93618-3533
(559) 591-6737

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-03 07:37:43

No Duplicates.

Comment 35 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Bill
Last Name: Higgins
Email Address: mmckelvey@cacities.org
Affiliation: League of California Cities

Subject: Comments on Draft Regional Greenhouse Gas Emission Reduction Targets
Comment:

Please see the attached comments.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/66-draft_375_targets.pdf

Original File Name: Draft 375 Targets.pdf

Date and Time Comment Was Submitted: 2010-08-03 14:13:16

No Duplicates.

Comment 36 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Jack
Last Name: Broadbent
Email Address: ayoung@baaqmd.gov
Affiliation: Bay Area Air Quality Management District

Subject: SB 375 Targets
Comment:

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Please see attached letter.
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/67-baaqmd_sb_375_letter.pdf

Original File Name: BAAQMD SB 375 letter.pdf

Date and Time Comment Was Submitted: 2010-08-03 14:48:44

No Duplicates.

Comment 37 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Gerald
Last Name: Cauthen
Email Address: Cautn1@aol.com
Affiliation:

Subject: [BATF] Failing to Meet AB 32 Requirements
Comment:

AB 32 calls for California's greenhouse gas (GHG)emissions to be reduced to 1990 levels by 2020. This represents a legitimate effort on the part of Governor Schwarzenegger and the State Legislature to do California's part to stave off, or at least slow, down horrific climate change.

In response, the Metropolitan Transportation Commission has just called for per capita GHG emissions to be reduced to 15% below the 2005 level by 2035. For this, it is unaccountably receiving praise in some quarters. First and foremost, in contrast to AB 32, MTC's approach does not take into account Bay Area significant projected population growth, the rate of which is likely to pick up as the economy recovers and as other parts of the northern hemisphere get hotter and drier. Secondly, given the large increase in GHG production that occured between 1990 and 2005 a 15% reduction from the 2005 level...even if it did include provision for population growth which it does not...would still leave the GHG production level 20% above 1990 levels. In fact, given MTC's weak response to the State mandate and considering the trend toward smaller vehicles and more efficient propulsion systems, the Bay Area's regional planners have in reality positioned themselves with little if anything to do. This is underscored by the fact that MTC projects that its anachronistic highway expansions and largely impotent public transit developments will actually increase regional VMT (vehicle miles per day) from the 107.7 million that prevailed in 1990 to 202.8 million by 2030.

See http://www.mtc.ca.gov/maps_and_data/datamart/stats/vmt.htm

In other words, since the forthcoming increases in fuel economy will by themselves reduce emissions, MTC is doing virtually nothing to address California's GHG problem. On the contrary, as evidenced by the above-indicated VMT increases, MTC's programs actually make the problem worse.

If there is anyone who seriously thinks that a 15% per capita reduction in GHG production by 2035 would get us even close to returning to a 1990 total emission level by 2020 as specified in AB 32, I have a shiney new bridge to sell them.

Gerald Cauthen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-03 15:49:39

No Duplicates.

Comment 38 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Richard
Last Name: Lyon
Email Address: rlyon@cbia.org
Affiliation:

Subject: SB 375 Coalition Letter
Comment:

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Thank you for the opportunity to submit comments.

Yours truly,

Richard Lyon
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/72-business_coalition_letter_on_draft_375_targets.doc

Original File Name: Business coalition letter on draft 375 targets.doc

Date and Time Comment Was Submitted: 2010-08-04 14:35:16

No Duplicates.

Comment 39 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Alex
Last Name: Pujo
Email Address: alex@pujo.net
Affiliation: COAST

Subject: GHG emission targets for Santa Barbara County
Comment:

July 1st, 2010

Doug Ito, Manager
SIP Local Government Strategies
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Ito,
The Coalition for Sustainable Transportation (COAST) is a non-profit organization in Santa Barbara County devoted to bringing about efficient and sustainable communities with attractive opportunities to travel by foot, bicycle and public transportation. We urge the Air Resources Board to set a useful Green House Gas reduction target for Santa Barbara County as part of the SB 375 process. As noted by Michael Chiacos of the Community Environmental Council in his recent letter from a coalition of local stakeholders, there are reasons to believe that much greater emissions reductions are achievable than those that the Santa Barbara County Association of Governments (SBCAG) has considered in their analysis for target setting.
The worst congestion in our area is caused by commuters driving from Ventura County to jobs in Santa Barbara's South Coast. In fact, the most expensive projects in SBCAG's Regional Transportation Plan (RTP) are aimed at relieving congestion caused by that long-distance commute. Land use policy changes in Santa Barbara County can and will have a significant influence on future GHG per capita in both counties.
Considering the significant role that the jobs/housing imbalance plays in GHG emissions, the miniscule target that SBCAG is proposing will result in blunting the intended goals of SB 375 on future transportation and land use planning in Santa Barbara County. This missed opportunity will cause adverse impacts at local levels and beyond. We respectfully urge the Air Resources Board to establish an emissions reduction target for Santa Barbara County consistent with those set for Ventura County and the rest of Southern California.
Sincerely,

Alex Pujo, President

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/73-coast_carb_letter_7-21-10.pdf

Original File Name: COAST CARB letter 7-21-10.pdf

Date and Time Comment Was Submitted: 2010-08-04 17:25:48

No Duplicates.

Comment 40 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: George
Last Name: Hague
Email Address: gbhague@gmail.com
Affiliation: Voter

Subject: Reduction target not enough
Comment:

The Southern California Association of Government(SCAG) plan to reduce by five to six percent the per capita greenhouse gas(GHG) emissions from the 2005 levels is woefully inadequate. They will probably expect the new mileage standards will take care of this and do very little to reduce vehicle miles traveled(VMT). The reduction of GHG should be set at a higher percentage and that which is accomplished through higher mileage rates of cars/light trucks should not be counted. The County of Riverside approved the leapfrog 11,250 unit project called the Villages of Lakeview in the middle of farmland. This happened in March of 2010 and because it has almost no permanent jobs there will be almost 15,000 Daily Commuters looking for work on our already clogged roadways. Many of them will drive to another County, because Riverside County has very few. Reduce GHG through a reduction in VMT and set a higher percentage rate-- especially for SCAG which has a much larger percentage of GHG emissions than any other MPO region or combination of several MPO regions. Help western Riverside County residents get out of being in a non attainment area through your actions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-06 21:21:00

No Duplicates.

Comment 41 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Art
Last Name: Unger
Email Address: artunger@att.net
Affiliation:

Subject: We must reduce vehicle miles traveled
Comment:

We must reduce vehicle miles traveled (VMT)by the increasing population of California. To do this we must greatly reduce each driver's VMT. It is necessary to reduce VMT in order to reduce air pollution and green house gas (GHG)emission.

If we achieve the carbon dioxide reductions of AB 32 and also reduce carbon dioxide levels 80% below 1990 levels by 2050, we will achieve carbon dioxide concentration of 450 parts per million. James Hansen and others have found that 350 parts per million is the highest concentration the planet can tolerate without profound impacts from climate change.

For these two reasons, VMT must be reduced much more than proposed.

Ways to decrease VMT include:
1 avoiding sprawl and walls around blocks of houses, so people can walk to stores
2 bike paths separated from cars by curbing
3 buses and light rail
4 avoiding free parking

Perhaps in the not so distant future we will have electric cars powered by electricity not generated by burning fossil fuels.

Thanks, Art

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-06 21:58:48

No Duplicates.

Comment 42 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Gladwyn
Last Name: d'Souza
Email Address: godsouza@mac.com
Affiliation:

Subject: Set tighter targets for SB375
Comment:

Please note that your draft targets for reductions in vehicle miles traveled, or VMTs are too low. I am writing as person concerned about traffic who has asthma. My children have asthma too.

Not only is this a climate issue, it is a quality of life issue. The draft targets would result in traffic increases of 9-18% by 2020 and 21 - 39% by 2035.

Tighter targets at the high end of the range would benefit us all. The solutions are easy to implement. They will benefit the states employment situation by forcing new technology. Existing zero energy systems like walkable communities will even benefit our aging population.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-07 20:28:59

No Duplicates.

Comment 43 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Edward
Last Name: Mainland
Email Address: emainland@comcast.net
Affiliation: Sustainable Marin

Subject: We need more VMT reductions in the Bay Area
Comment:

Based on Sierra Club California's calculations, ARB's draft targets for reductions in vehicle miles traveled (VMT) are much too low. They are far from sufficient to deal with greenhouse gas emissions or to meet the state's goals for carbon emissions reductions. It is illogical for ARB to set VMT targets that would actually -- according to some estimates -- give us traffic increases of 9-18% by 2020 and as much as 30% by 2035. Government's first duty is public health and safety. Final carbon emissions reductions must be based on the Governorâ€™s Executive Order (and what the climate scientists have estimated is safe), which is at least 40% below 1990 levels by 2035. VMT targets must be set accordingly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-08 15:04:55

No Duplicates.

Comment 44 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Jenny
Last Name: Wilder
Email Address: JensOasis@aol.com
Affiliation: Mojave Group, Sierra Club

Subject: strong targets needed for quality of life
Comment:

Comments on Draft Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Truck pursuant to SB375 submitted by Jenny Wilder on behalf of the Mojave Group, Sierra Club.

Mary Nichols, Chair
California Air Resources Board
1001 â€œIâ€• Street
Sacramento, California 95814
http://www.arb.ca.gov/cc/sb375/comments.htm
August 7, 2010

Dear Chairman Nichols:
We encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375.

The weak targets contemplated by the majority of metropolitan Planning Organizations (MPOs) and in particular the Southern California Association of Governments (SCAG) are far too low to provide for any improvement in overall greenhouse gas emission reduction. The weak â€œper capitaâ€• targets proposed by the majority of MPOs will undermine existing tools to reduce greenhouse gas emissions and could result in greater emissions than would have otherwise been achieved in the absence of SB 375.

By using such low goals the opportunity to guide development in the State toward a sustainable future that will provide significant improvements in public health and environmental benefits will be lost. Lost too will be the incentive needed to provide for more livable communities. Such communities include transportation plans where walking and bicycling are viable alternatives and where the disabled, young and elderly can get around conveniently on public transportation.

Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient and least congesting form of transportation and needs to be encouraged. Bicycling can get one to the store, job or school in a much healthier state than by any other means of transportation. Bicycling should no longer be considered only recreational, but a part of every community transportation plan, as should walking.

Currently leap-frog development resulting in sprawl has failed to provide for sustainable, livable communities. Such development encourages the inner city â€œghost â€“townâ€• syndrome that results

in slums and crime and it assumes that everyone has the option of driving a vehicle. Not everyone has that option. We must challenge our regional and local governments to change the way we plan and develop our communities and transportation systems to reduce vehicles miles traveled and greenhouse gas emissions while also protecting and improving public health and the environment.

The claims that adding freeway lanes would reduce GHG emissions is flawed. Despite this claim it remains obvious to most observers that building more highways would conflict with the climate-changing objectives that we seek. The HOT lane program would not â€œmove us in the right GHG direction.â€• People who can afford to drive will not reduce their driving and increase their transit-riding until there is a public transit alternative in place that is both well-integrated and reliable. These are obtainable objectives, but it will take a concerted regional transportation planning effort to achieve them. Every freeway should have a clean alternative such as rail or dependable bus service.

For the reasons set forth above, we urge ARB to adopt strong targets that require the transformational shift in land use and transportation polices envisioned under SB 375.

Sincerely,
Jenny Wilder, Chair, Mojave Group, Sierra Club

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-09 07:11:51

No Duplicates.

Comment 45 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Various
Last Name: Stakeholders
Email Address: ombcomm@arb.ca.gov
Affiliation:

Subject: Comments
Comment:

```
23 of the attached form comment letters were received between July
16-26th.

Signatures include:
Robert Dhondrup (SCANPH)
Cesar Covarrubias (The Kennedy Commission)
Acacia Squires (Habitat for Humanity)
Shashi Hanuman (Public Counsel Law Center)
David Levy (Affordable Housing Activist)
Executive Direct Glenn Hayes (NHS of Orange County)
President Ann Sewill (Community Foundation Land Trust)
Jose Toro (JN Toro Architect)
Lara Morrison (Beverly-Vermont Community Land Trust)
Lisa Motoyama
Molly Rysman (Skid Row Housing Trust)
Chenoa Mason (Thomas Safran and Associates)
Anuj Dua (FSY ARCHITECTS INC)
Sheri Randolph (Desert Manna Ministries, Inc.)
VP of Housing, Alexander Russell (Many Mansions)
Principal Jennifer Lee-Anderson (CLA & Associates)
Rev. Jennifer Gutierrez (CA-Pacific Conference United Methodist
Church)
Kathleen Lawrence
Judy Branfman
John DiNapoli (La Casa Realty)
Marilyn Bruce (Skid Row Housing Trust)
Prof. Peter Dreier (Occidental College)
Elizabeth MacKillop (Torti Gallas and Partners, Inc.)
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/80-formcomment.pdf

Original File Name: FormComment.pdf

Date and Time Comment Was Submitted: 2010-08-11 13:21:05

No Duplicates.

Comment 46 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Steven
Last Name: Schneider
Email Address: lkimura@arb.ca.gov
Affiliation:

Subject: Comment on Regional Greenhouse Gas Reduction Targets Under SB 375
Comment:

```
See attached comment letter received via post mail on July 27,
2010.
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/81-schneidercomment.pdf

Original File Name: SchneiderComment.pdf

Date and Time Comment Was Submitted: 2010-08-11 13:48:19

No Duplicates.

Comment 47 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Kristine
Last Name: Thalman
Email Address: lkimura@arb.ca.gov
Affiliation: BIA, Orange County and Others

Subject: Comments on Draft Regional GHG Emission Reduction Targets
Comment:

```
See attached comment letter on Draft Regional Greenhouse Gas
Emission Reduction Targets received via post mail on August 2,
2010.

Signed by the following organizations:

Building Industry Association, Orange County
OC Business Council
OC Taxpayers Assn
Orange County Assn of Realtors
NAIOP SoCal Board Member
South Coast Apartment Assn.
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Attachment: www.arb.ca.gov/lists/sb375-targets-ws/82-orangecountyorganizations.pdf

Original File Name: OrangeCountyOrganizations.pdf

Date and Time Comment Was Submitted: 2010-08-11 13:48:19

No Duplicates.

Comment 48 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Mark
Last Name: Green
Email Address: lkimura@arb.ca.gov
Affiliation: Union City

Subject: Support for Clean Cars Program and SB 375 to reduce vehicle emissions
Comment:

See attached comment letter on SB 375 received via post mail on July 6, 2010.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/83-union_city_commentpdf.pdf

Original File Name: Union City Commentpdf.pdf

Date and Time Comment Was Submitted: 2010-08-11 13:48:19

No Duplicates.

Comment 49 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Valerie
Last Name: Brown
Email Address: lkimura@arb.ca.gov
Affiliation: Sonoma County Board of Supervisors

Subject: Support for SB 375
Comment:

```
See attached comment letter on SB 375 received via post mail on
July 1, 2010.
```

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/84-sonoma_comment.pdf

Original File Name: sonoma comment.pdf

Date and Time Comment Was Submitted: 2010-08-11 13:48:19

No Duplicates.

Comment 50 for Comments on regional targets for SB 375 (sb375-targets-ws) - 1st Workshop.

First Name: Andy
Last Name: Henderson
Email Address: ombcomm@arb.ca.gov
Affiliation: Building Industry Association of S CA

Subject: Additional Concerns about the Draft Emission Reduction Target Ranges
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/sb375-targets-ws/85-bia-sc_memo_july_26-2010.pdf

Original File Name: BIA-SC Memo_July 26-2010.pdf

Date and Time Comment Was Submitted: 2010-08-17 13:53:25

No Duplicates.

There are no comments posted to Comments on regional targets for SB 375 (sb375-targets-ws) that were presented during the Workshop at this time.