Comment 1 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Bob
Last Name: Johnston
Email Address: rajohnston@ucdavis.edu
Affiliation: UC Davis

Subject: Transportation Policies
Comment:

You leave out of Recommended Measures many transportation policies that would be economically beneficial for the State. You then list many of these in the Other Measures. Most of these policies have been studied in detail, such as freesay congestion tolls (which probably increase VMT and GHGs), all-day freeway tolls, feebates, PAYD insurance, fuel taxes, and worktrip parking charges. The CEC has studied some of these measures, for example, and the others have been modeled and, in some cases, empirically studied in the U.S. and EC nations.

Most notable by its absense is a policy to direct Federal, State, and local transportation funding to transit, walk, and bike, in the future. After all, this sector shows the fastest growth rate in GHGs in most State and national projections. It is well known that we must invest in transit and let our highways become congested, in order to get households to take transit, walk and bike, reduce auto ownership, and reduce auto travel. Also, to get them to move to closer-in locations. This, for example, is the policy in the London region, perhaps the most-modeled region in the world. Most transportation researchers believe that we must reduce VMT to attain the 2020 standard. I believe there will be slippage in the GHG reductions projected in this draft Scoping report. We certainly will need to substantially reduce VMT, in order to attain the 2050 standard in the Executive Order and in the IPCC and Stern reports. These transportation and related land use changes require decades to work and so need to be adopted sooner, not later.

If you wish to punt these into the next 5-year round because more political work needs to be done with cities and counties, then say so. This can be worded as letting them test policies on their own, etc. You also should state what the problem is with Caltrans not exercising leadership on the investment issue. It is true that this problem extends into the Legislature, which has simultaneously decided to build more freeways and to reduce GHGs. Perhaps the ARB can analyze the additional GHGs that these capacity additions will produce and the cost to reduce a like amount, with other policies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-27 19:29:39

No Duplicates.

Comment 2 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Nathan
Last Name: Champlin
Email Address: nathan_champlin@dca.ca.gov
Affiliation: Bureau of Automotive Repair

Subject: New HDDV Early Action Measure
Comment:

```
Knowing that heavy duty diesel trucks produce the most emissions
(criteria and GHG) when accelerating from a complete stop, they
should be permitted to use the carpool lanes on controlled freeway
onramps. The reductions benefit will be easy to calculate and
should be impressive to the Board.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-03 09:25:17

No Duplicates.

Comment 3 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Todd
Last Name: Litman
Email Address: litman@vtpi.org
Affiliation: VTPI

Subject: Pay-As-You-Drive Pricing
Comment:

Pay-As-You-Drive (PAYD, also called "distance-based") pricing converts currently fixed vehicle charges, such as insurance premiums and registration fees, into variable costs, so the more annual miles a vehicle is driven they greater the charge. These mileage-based fees can incorporate all existing pricing factors.

PAYD pricing is justified on a number of grounds, including actuarial accuracy, insurance affordability, consumer cost savings, increased traffic safety, reduced uninsured driving, and reductions in traffic congestion, road and parking facility costs, and support for strategic land use objectives (reduced sprawl), as well energy conservation and pollution emission reductions. It is not a new fee at all, just a different way to pay existing vehicle fees.

This concept has been investigated by a number of researchers, as discussed in:

"Distance-Based Pricing" (http://www.vtpi.org/tdm/tdm10.htm)

Jason E. Bordoff (2008) Pay-As-You-Drive Car Insurance, Brookings Institution (www.brookings.edu/articles/2008/spring_car_insurance_bordoff.aspx).

Aaron S. Edlin (2003), “Per-Mile Premiums for Auto Insurance,” Economics for an Imperfect World: Essays In Honor of Joseph Stiglitz, MIT Press; at: http://works.bepress.com/aaron_edlin/28.

Todd Litman (1997), “Distance-Based Vehicle Insurance as a TDM Strategy,” Transportation Quarterly, Vol. 51, No. 3, Summer 1997, pp. 119-138; at www.vtpi.org/dbvi.pdf.

Todd Litman (2008), Pay-As-You-Drive Insurance: Recommendations for Implementation, VTPI (www.vtpi.org); at www.vtpi.org/payd_rec.pdf.

The draft Scoping Plan considers PAYD insurance, but the analysis is incomplete for the following reasons:

1. It does not consider distance-based pricing options, such as PAYD vehicle registration fees, lease fees and purchase taxes.

2. The analysis seems to assume that only a minor portion of

insurance premiums would become distance-based.

3. The analysis does not seem to account for co-benefits such as traffic safety, affordabilty, congestion reductions, road and parking facility cost savings,

4. The analysis seems to assume that PAYD would be implemented using electronic instrumentation that tracks when and where a vehicle is driving, which adds costs and raised privacy concerns.

To correct these omissions, additional analysis should be performed with the following features:

* All vehicle insurance premiums and registration fees are converted to basic PAYD pricing, based on annual odometer audits (odometer readings collected by a third party, such as service stations and insurance brokers).

* The PAYD pricing analyzed meets the minimum standards defined in my report, "Pay-As-You-Drive Pricing: Recommendations for Implementation" (www.vtpi.org/payd_rec.pdf).

* The analysis takes into account economic and social co-benefits, including crash reductions, congestion reductions, consumer cost savings, and road and parking facility cost savings.

I believe that this more comprehensive analysis will show much greater emission reductions and benefits than what was previously considered. Odometer-based pricing eliminates privacy concerns.

Attachment: www.arb.ca.gov/lists/sp-transport-ws/3-payd_recommendations_june2008.doc

Original File Name: PAYD Recommendations June2008.doc

Date and Time Comment Was Submitted: 2008-07-03 10:29:03

No Duplicates.

Comment 4 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Pedro
Last Name: Macanas
Email Address: macanas_ped@gva.es
Affiliation:

Subject: Suggestion
Comment:

```
I suggest the acquisition parity, this is, all the PHEV and
All-Electric Vehicles have the same prices (applying the rebate
from the Alternative Fuel Vehicle Incentive Program) to an
equivalent all-petroleum.

Small cars would have priority (more efficiency).

Regards.

P.S.: I suggest include Smart car (microhybrid) and promote
similar
microhybrid electric cars (city cars).
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-05 10:41:20

No Duplicates.

Comment 5 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Frances
Last Name: Mathews
Email Address: mathewsfran@sbcglobal.net
Affiliation: League of Women Voters

Subject: Public transportation
Comment:

```
We need better public transportation.  More trains, high speed rail
lines to San Francisco and San Diego, and connections between
modes.  For example, why does the Green Line not connect with a
Metrolink station?  Why does it not go directly into LAX?
Connections between different legs would make the whole system
much more useful.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 10:59:13

No Duplicates.

Comment 6 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Charlotte
Last Name: Pirch
Email Address: dpirch@socal.rr.com
Affiliation: LWV of Orange Coast

Subject: AB32 Workshop: Transportation
Comment:

```
TRANSPORTATION PRODUCES ABOUT 40% OF GREENHOUSE GAS EMISSIONS IN
CALIFORNIA. CARB SHOULD WORK FOR ELECTRIFICATION OF COMMERCIAL,
PUBLIC AND PRIVATE TRANSPORTATION.

PLEASE CALL FOR FAST-TRACKING REGIONAL MASS TRANSIT
INFRASTRUCTURE, INCLUDING BUS RAPID TRANSIT PROGRAMS (ESPECIALLY
ON EXISTING FREEWAY HOV LANES), EXPANSION OF AMTRAK SERVICE,
HIGH-SPEED PASSENGER RAIL, ELECTRIFIED COMMERCIAL TRANSPORT, AND
WISE LOCATIONS FOR TRANSIT STATION LOCATIONS IN NEIGHBORHOODS.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 16:39:29

No Duplicates.

Comment 7 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: James
Last Name: Miller
Email Address: jrusmiller@yahoo.com
Affiliation:

Subject: Low Carbon Fuel Standard
Comment:

```
The ARB and its staff for LCFS should be obligated to accept third
party standards and certified evaluators of those standards
instead of creating their own standards. Possible standards to
chose could the the CCX, CDM, the Gold Standard, or any other
international standard. Several standards should be selected for
use.

This idea should also be addressed in the section C.3 on offsets
calculations.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 16:46:41

No Duplicates.

Comment 8 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Christopher
Last Name: Perkins
Email Address: c.perkins@skytran.net
Affiliation: Unimodal Systems

Subject: Personal Rapid Transit
Comment:

```
Personal Rapid Transit (PRT) could reduce emissions by 6.9 mmt by
only building 500 miles of PRT by 2017 in urban areas. Since the
system is more desirable than other forms of public transit (no
schedule, privacy, reduces congestion), the potential reductions
of VMT, and therefore, C02 emissions is much higher. The final
ETAAC report (http://www.arb.ca.gov/cc/etaac/ etaac.htm) already
recommended that California should evaluate this technology. The
scoping plan should identify key stakeholders and establish a task
force to validate the claims being made by the industry.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-11 12:26:59

No Duplicates.

Comment 9 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Mehdi
Last Name: Morshed
Email Address: mmorshed@hsr.ca.gov
Affiliation: California High-Speed Rail Authority

Subject: Comments
Comment:

```
Comment letter attached.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/9-carb_letter_updated_07_07_2008.pdf

Original File Name: CARB Letter updated 07 07 2008.pdf

Date and Time Comment Was Submitted: 2008-07-14 14:43:50

No Duplicates.

Comment 10 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Caroline
Last Name: Peck
Email Address: cpeck99@gmail.com
Affiliation:

Subject: Cal Trans funds should support non-mech transportation
Comment:

```
I saw nothing in here about promoting walking and bicycling to work
/errands.  Cal Trans should fund EIR and retrofits of neighborhoods
to have continuity of bike lanes, traffic calming strategies,
adequate sidewalks and plenty of trees - drought tolerant of
course.  Why are huge sums of transportation funds always directed
to automobiles?  The majority of funds should be towards mass
transit and non-mechanized transportation.  For example, forget
freeway expansion - in Sacramento we should be funding a light
rail to the airport, elk grove, roseville, west sacramento and el
dorado hills.  this is a win-win, as it will reduce emissions,
help combat the obesity epidemic, empower elders to remain
physically active, decrease accidents/injuries/fatalities and
support local businesses.  It will also address inequalities that
affect minority populations, as it gives them more transportation
options.  I would like to see verbage such as 'complete streets'
'road diets' sustainability, liveability, safety in the plan.
Thank you.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-14 15:08:24

No Duplicates.

Comment 11 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Rebecca
Last Name: Overmyer-Velazquez
Email Address: rovermyer@whittier.edu
Affiliation:

Subject: Trains need to be included!
Comment:

```
The draft plan mentions heavy duty trucks but there is no mention
of trains and rail yards, which CARB knows very well are
significant sources of pollution especially in low-income
communities.The low carbon fuel standard should apply to trains
and rail yard operations and intensive monitoring of GHG emissions
from rail yards needs to be conducted, with monitoring accompanied
by real regulatory power. We can't let the railroad companies be
exempt from AB 32!
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 11:47:59

No Duplicates.

Comment 12 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Rajiv
Last Name: Tata
Email Address: rtata@utm.com
Affiliation: Utility Trailer Manufacturing Company

Subject: SmartWay Discrete Early Action Measure
Comment:

Please accept the following comments on behalf of Utility Trailer Manufacturing Company ("Utility") to the California Air Resources Board's ("CARB") May 21, 2008 Draft Heavy-Duty Vehicle Greenhouse Gas Reduction Measure (the "Draft Measure"). For the reasons set forth below, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for further studies examining the technological feasibility and cost effectiveness of the requirements of the Draft Measure.

I. Company Background

Based in City of Industry, California, Utility is America's oldest privately owned, family-operated semi-trailer manufacturer. Founded in 1914, Utility is the largest producer of refrigerated semi-trailers in the United States and the third largest semi-trailer manufacturer in the country. Utility currently operates five regionally placed semi-trailer factories, located in Virginia, Utah, Alabama and Arkansas, and employs over three thousand people nationwide. Utility's historical position as America's largest producer of refrigerated semi-trailers is a direct result of its management's focus on designing road safe semi-trailers in an environmentally responsible manner.

Utility representatives recently attended the June 12, 2008 workshop session for the Draft Measure held at CARB's offices in El Monte. While Utility supports the federal Environmental Protection Agency's ("EPA") voluntary SmartWay program to increase fuel efficiency while reducing greenhouse gas emissions, there are numerous issues in the Draft Measure relating to technological feasibility and cost-effectiveness, the analyses of which have not progressed to the point where the impacts of same can be conclusively defined at this early time. Utility offered some suggestions as to how to address some of these outstanding issues during the workshop. As a follow up to the workshop, Utility hereby respectfully submits the following comments to the Draft Measure to urge CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to further examine the issues identified herein.

II. California Global Warming Solutions Act of 2006 (the "Act")

As you know, Section 38560 of the Act requires that all greenhouse gas reduction rules and regulations adopted and implemented by CARB be technologically feasible and cost-effective. However, the

mandated time frame for implementing the Act's requirements has resulted in CARB itself stating that:

> While staff has advanced its understanding with respect to key require-
> ments that must be addressed for most of the proposed strategies, the
> analyses have not progressed to the point where all impacts (e.g., technical
> feasibility, cost-effectiveness) can be defined conclusively at this time. . .
> If additional information of analysis reveals that a particular measure
> cannot meet one or more of these requirements, it will not be put into effect.

EXPANDED LIST OF EARLY ACTION MEASURES TO REDUCE GREENHOUSE GAS EMISSIONS IN CALIFORNIA RECOMMENDED FOR BOARD DECISION, California Air Resources Board (October 2007).

Indeed, there are numerous sub-categories of issues relating to the technological feasibility and cost-effectiveness of the Draft Measure which require further analysis prior to CARB adopting same as a discrete early action. A discussion of these issues is set forth below.

III. Technological Feasibility

The technological feasibility of the aerodynamic devices that trailer manufacturers will need to append to their products will depend on such as issues as the completion of laboratory and field tests studying the compatibility of the aerodynamic devices with trailer bodies, and national standards governing the specifications of other fuel-saving devices.

A. Adequate Testing

The primary reason Utility is urging CARB to reclassify the Draft Measure as a non-regulatory early action is that the implementation date of the Draft Measure is premature due to the lack of adequate testing needed to fully develop the required aerodynamic devices. More tests are required on these devices not only for confirming their claimed efficiencies, but for safety reasons.

1. Gap Reducers

One such device, the front mounted "gap reducer," was developed some time ago by a west coast company called Nose Cone. To qualify its product for the SmartWay program, Nose Cone needed to achieve a fuel economy gain of at least one percent (1%). To demonstrate this gain, Nose Cone ran a SAE J1321 type 2 test. Another company, Freight Wing, also manufactures a gap reducer and was approved by SmartWay by conducting similar testing. However, neither of these companies' qualifying tests were performed in conjunction with other potentially fuel saving devices such as side and roof fairings and in situations where a tractor is "close coupled" to a trailer. In the event a tractor is tested with a trailer, with and without the gap reducer, there would likely be no appreciable benefit from the gap reducer, thus rendering them ineffective in achieving the Draft Measure's stated purpose.

Moreover, a primary aerodynamic principle in running efficiency is to situate the back end of the tractor within 28″ or less of the trailer. If such placement is achieved, the need for a “gap reducer” to save fuel is mitigated. Therefore, the significant cost associated with adding gap reducers does not provide the benefit the Draft Measure is intended to provide.

2. Side Skirts

Other aerodynamic devices such as side skirts are made from either injection molded plastic or aluminum sheet construction. During normal driving conditions these devices can be damaged while crossing railroads and drive ways, and during loading and unloading at docks with tapered ramps. Once damaged, the operator typically has to remove the device or risk it falling off during transit. Notwithstanding such safety issues, if the operator does not remove the damaged device, it will not achieve its intended fuel savings. Moreover, these devices have to perform in all weather conditions, including but not limited to rain, snow, ice, and combinations thereof. Additional testing is necessary to ensure these devices are durable and have predictable failure modes that will not cause catastrophic failure during high speed highway transport.

Additional development is currently underway from manufacturers to develop sturdier, more operator friendly devices. However, subsequent generations of these products will require SAE testing. Adopting regulations requiring the use of such untested products is therefore premature.

3. Fairings and Boat Tails

The newest devices to qualify for the SmartWay program are rear trailer fairings and boat tails. Once such approved device claims it improves fuel economy by 5.1% at 62 MPH. This device is currently undergoing “crash” testing for DOT approval. As such, this device is still in the prototype development phase of design and is not being used in commercial applications. Again, adopting regulations requiring the use of such untested devices is premature.

4. Performance and Safety

The common concern regarding all of the aforementioned devices is the need for additional testing, whether due to performance or safety issues. With respect to performance, there is a significant difference between running a controlled test and proving a device achieves the fuel savings it claims. Significantly, none of the tests that claim such aerodynamic devices save fuel have been verified by independent third parties who do not have a vested commercial interest in the premature adoption of the Draft Measure. Moreover, tests performed to date involve just one test with one tractor on one day. It is also important to recognize that each of the approved devices was tested individually. As mentioned above, there is currently a dearth of studies testing the above aerodynamic devices in combination, i.e., side skirts and gap reducer, gap reducer and trailer tail, etc. The SmartWay program tends to cumulatively add the fuel saving benefits of multiple aerodynamic devices. Unfortunately, none of these cumulative benefits have been proven in the field. Indeed, a device that initially indicates a benefit may not have the same result when combined with another device.

For these reasons, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for further testing of the issues identified herein.

With respect to safety issues, as previously mentioned, aerodynamic devices are often damaged while crossing railroads and drive ways, and during loading and unloading at docks with tapered ramps. They also have to perform in all weather conditions such as rain, snow and ice. Once damaged, the operator typically has to remove the device or risk it falling off during transit. Additional testing is necessary to ensure these devices are durable and have predictable failure modes that will not cause catastrophic failure during high speed highway transport.

In the event CARB proceeds with classifying the Draft Measure as a discrete early action, it appears that Utility, other trailer manufacturers, and aerodynamic device manufacturers will be forced to place products on the market that may not be able to withstand the rigors of heavy duty transportation. One potential consequence of this situation may be a significant increase in the costs associated with satisfying customers' warranty claims. Such claims would increase not only the actual costs of replacing and/or repairing unsatisfied customers' trailers, but also the administrative costs of coordinating and responding to such claims as well as potential consequential costs in the loss of unsatisfied customers. Moreover, Utility and other trailer manufacturers may see an increase in the number of product liability claims filed against them. The increased costs associated with defending, and potentially satisfying unfavorable verdicts rendered against Utility and other trailer manufacturers for using untested aerodynamic devices on their trailers would again significantly increase the cost of doing business. Such increased costs will provide yet another significant hurdle to overcome to remain competitive in a global marketplace. For these reasons, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for further testing of these products.

B. Need for National Standards

Section 2800(d) of the Draft Measure sets forth requirements and compliance deadlines for new and in-use tractors and trailers. One of these requirements is for these vehicles to be fitted with low-rolling resistance tires. As discussed in the June 12 workshop, tire manufacturers set their own standards to determine rolling resistance. By unilaterally defining "low-rolling resistance" tires, tire manufacturers can alter the intended benefits of the fuel efficiencies the Draft Measure seeks to achieve. As such, a federal standard for defining "low-rolling resistance" tires is necessary prior to requiring new and in-use tractors and trailers to use such tires. This process, allowing for petitions for rule making and notice and comment periods, will take time. Moreover, in the event such a rule is adopted, a phase-in period will be required to allow tire manufacturers to comply with the new requirements. For these reasons, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for such rulemaking to run its course.

C. Technologically Limiting Definitions

Section 2800(e) of the Draft Measure sets forth “Good Operating Condition” criteria for the maintenance of tractors and trailers. Sections 2800(e)(1)(B)(1) and (2) further describe the specifications for side skirt fairings and front and rear trailer fairings. Based on the language used to describe these devices, it is evident that these specifications were strictly based on the patents for those devices. By utilizing language appropriate for a single, unique, patentable product, rather than a broader, generalized concept, the Draft Measure may preclude innovation. Indeed future research and development may result in devices that offer much greater fuel efficiency than is available today. Under the current “Good Operating Condition” standard, such new products would fail to comply with CARB’s requirements and thus would be precluded from being introduced into the marketplace. For these reasons, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for revisions to the Draft Measure.

IV. Cost-Effectiveness

As noted above, the Act mandates that all greenhouse gas reduction rules and regulations adopted and implemented by CARB be, inter alia, cost-effective. Two factors that determine the cost-effectiveness of compliance with a particular regulatory program include maintenance costs and their effect on competition.

A. Maintenance Costs

Like any industry, the transportation business is very competitive. Often, the difference between success or failure is determined by a company’s cost per mile. Proven technologies that can lower transportation companies’ cost per mile would likely be embraced by the industry. However, lowering the cost per mile must inherently address reducing initial costs, potential lower payloads due to the additional weight of aerodynamic devices, and necessary maintenance costs for the aerodynamic devices. Adopting the Draft Measure without fully analyzing these issues will likely prevent the Draft Measure from achieving its intended effect. Indeed, in Europe, where fuel prices are substantially higher than in the United States, regulations similar to the Draft Measure were adopted and ultimately repealed because, once implemented, proved not to be cost effective.

Currently, side skirts carry significant maintenance costs. Such costs are associated with damages incurred during normal use, including crossing railroads and drive ways, loading and unloading at docks with tapered ramps, and the elements. Once damaged, the operator typically has to remove or repair the device, which might result in down time. Although manufacturers are currently developing additional designs to lower the aforementioned costs, none are currently commercially viable. At some point in the future, these manufacturers may have commercially viable devices that will provide fuel savings without significant maintenance costs that raise a company’s cost per mile instead of lowering it. However, that time has not yet arrived. For these reasons, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for such product development to occur.

B. Effect on Competition

There are currently only two (2) aerodynamic device manufacturers with products that are certified by the SmartWay program. Both manufacturers are relatively small, and would not have the capacity to manufacture the volume of devices necessary if fifty percent (50%) of 2010 model year trailers needed their products to comply with the Draft Measure. Based on a projected volume of 220,000 trailers to be produced in 2010, aerodynamic device manufacturers would need to manufacture 110,000 devices to meet this demand. It is doubtful these small companies have the capacity to handle such demand.

In addition, a limited number of suppliers of certified SmartWay products required for compliance with the Draft Measure could increase production costs for Utility and other trailer manufacturers by the suppliers' ability to unfairly determine the price of their products. This will likely be caused by an increase in demand for their products due to the expedited adoption of the Draft Measure. It will also take some time before other manufacturers will be able to bring alternative products to market to present viable options to tractor and trailer manufacturers, thereby eliminating the ability of natural market forces to keep prices in check. In sum, by failing to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan, CARB could subject a portion of its regulated community to the scrutiny of the Federal Trade Commission.

V. Regulation-Specific Comments

In the event CARB chooses not to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan, Utility offers the following specific comments related to the language of the Draft Measure:

A. Section 2800(b)(1)

The Draft Measure should not be limited in its applicability to just 53-foot trailers. Although the majority of trailers Utility sells are 53 feet in length, there are existing populations of varying lengths of trailers that could also benefit from the aerodynamic devices required by the Draft Measure. Moreover, the burdens imposed by the Draft Measure to achieve its purpose and goals should be jointly borne by all Californians, not just the trucking industry. CARB should focus on every vehicle that travels on California's highways, not just the heavy-duty tractors and trailers that deliver products necessary for millions of peoples' every day lives. If the regulation of the transport of these necessities becomes too restrictive, the result will be an increase in the cost of those products at a time when the transportation industry can not absorb such increased costs. While Utility supports the Draft Measure's purpose, the latter fails to reflect the understanding that the burdens of its requirements outweigh its benefits.

B. Section 2800(c)(3)

Delete the language, ". . . or curtain-side trailer that is not a drop-frame trailer." Utility does not have designs for a side skirt for a curtain side trailer. If one was produced or modified for installation on a curtain sided trailer, it surely would not provide the 4% fuel efficiency savings that the same skirt would

have on a box trailer due to its inboard mounting location.

C. Section 2800(c)(8)

This section should be deleted in its entirety for the same reasons as set forth in the comments relating to subsection (c)(3) above.

D. Section 2800(c)(12)

Delete the language, ". . . that can only be loaded/unloaded through the rear doors." Some trailers have side doors through which unloading can be completed.

E. Section 2800(c)(21)

As you likely know, California and several other western states allow 14'0" tall trailers. Most of the factory produced roof fairings are designed for the more standard 13'6" tall trailers. Utility is currently unaware of how it would design roof fairings for particular hauls with 14' trailers. Based on the foregoing, Utility suggests the last line of this subsection's language be amended to provide that the roof fairings be of a height "that matches the height of a 13'6" height trailer."

F. Section 2800(c)(29)

The word "transportable" should be amended to read "transport."

G. Section 2800(c)(31)

Utility is not aware of any aerodynamic drag or friction between the tire and rim. As such, the language "and between the tire and the rim" should be deleted.

H. Section 2800(c)(36)

As you likely know, according to the California Motor Vehicle Code, a trailer is not part of a truck. Rather, the trailer is the vehicle that carries the cargo pulled by the motorized tractor. This subsection should be re-drafted to reflect this difference.

I. Section 2800(c)(37)

The language, ". . . between the support legs and the forward most axle" should be added to the end of the definition of "Trailer Side Skirts."

J. Section 2800(c)(38)

As products are generally not transported in tractors, the words, ". . . tractors and" should be deleted.

K. Section 2800(d)(1)(B)

Since one requirement for obtaining SmartWay certification is the utilization of low resistance tires, it appears that subsections (d)(1)(A) and (d)(1)(B) are redundant. As such, subsection (d)(1)(B) can be deleted.

L. Section 2800(d)(1)(C)

The applicability of this subsection should be extended to tractors that haul containers and “short haul” tractors. This would necessitate a national standard to determine which tires qualify as “low rolling resistance tires.”

M. Section 2800(d)(3)

The requirements of this subsection may be premature as the EPA has not yet established refrigerated van trailer requirements as part of its SmartWay program.

N. Section 2800(d)(4)

This subsection should be deleted in its entirety for the reasons set forth above in the comments to Section 2800(c)(3).

O. Section 2800(d)(5)

The language, “. . . and subsections (d)(4) for curtain-sided trailers” should be deleted for the reasons set forth above in the comments to Section 2800(c)(3).

P. Section 2800(d)(11)(A)(1)

The words “of freight” after the word “transported” should be deleted.

VI. Conclusion

Pursuant to the Act, all rules and regulations enacted by CARB are required to be technologically feasible and cost efficient. As noted in the discussion above, there are numerous outstanding issues pertaining to performance, safety, maintenance costs and anti-competitive effects that should preclude CARB from enacting the Draft Measure under the Act. Therefore, Utility urges CARB to reclassify the Draft Measure as a non-regulatory early action under the 2008 Scoping Plan to allow for further studies examining the technological feasibility and cost effectiveness of the requirements of the Draft Measure.

Thank you for the opportunity to comment on this issue. If you have any questions regarding Utility’s submission, please do not hesitate to contact the undersigned.

Attachment: www.arb.ca.gov/lists/sp-transport-ws/12-carb_smartway_truck_efficiency_comment_ltr.pdf

Original File Name: CARB Smartway Truck Efficiency Comment Ltr.pdf

Date and Time Comment Was Submitted: 2008-07-16 12:04:10

No Duplicates.

Comment 13 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: pascal
Last Name: joly
Email Address: pascal@surewest.net
Affiliation: bikingroseville.org

Subject: include support for alternative transportation
Comment:

```
I would like to get increased visibility to the following key
components to help achieve the targets of AB32 :
- public transit, including increased local light rail and long
distance high speed train
- walkable communities
- bicycle friendly communities, bicycle as an alternative mode of
transportation.

thanks,
Pascal Joly
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-16 13:55:01

No Duplicates.

Comment 14 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Beckie
Last Name: Menten
Email Address: bmenten@cityofarcata.org
Affiliation: Energy Specialist, Local Government

Subject: Danger in LCFS
Comment:

```
What are the strategies for implementing the LCFS?  Are you
intending on relying on ethanol, and if so is consideration being
given to the negative effects of intensive agricultural production
methods?
My advice would be to focus on organic agricultural methods for
the production of biofuels and in particular blocking dangerous
GMO and pesticide/fertilizer intensive agriculture.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 10:24:07

No Duplicates.

Comment 15 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Paul
Last Name: Watkins
Email Address: pawatkins@sbcglobal.net
Affiliation: The Solar Patio Cover Co.

Subject: Solar Vehicle Charging Stations
Comment:

```
I have read the first few pages of the Executive Summary, and I
want to know if there are any actions that may be taken before
November 2008.  I am doing a demonstration of a Solar Vehicle
Charging Station in seven to ten days and will go into production
within ten days after that.  Is there any possibility of a Grant
or Low Interest Loan to help with this introduction?

Thank you for any response you can give me about this.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 13:49:01

No Duplicates.

Comment 16 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

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

Subject: AB 32 Draft Scoping Plan Comments
Comment:

Thanks for the opportunity to make comments.

Section II. Preliminary recommendation
We strongly urge a adding a recommendation to reduce Vehicle Miles Traveled (VMT). We believe it is astonishing such a recommendation is not included since the direct and ancillary benefits are so high. The potential for reduction of GHG emissions from the transportation sector is great since nearly 40 percent of GHG emissions come from transportation. It is the sector responsible for the biggest share of GHG emissions. Yet out of the current 469 MMT of CO2 equivalent emissions and the proposed reductions of 169 MMT, only a miniscule amount of reductions (2 MMT) is slated for the "Local Government Action" measures. Those 2 MMT are shown under "local government action" where the community transportation and community design topics are buried.

Shifting trips from automobiles to transit, walking and bicycling offers enormous opportunities to reduce GHG emissions. California and the rest of the U.S. currently have a small share of all trips made by these modes. Yet in most of the world, including developed countries in Europe and Asia, the mode shares for transit, walking and bicycling are competitive with automobile use. Higher mode shares for transit, biking and walking are clearly achievable in California on a very cost-effective basis.

"Funding bicycle facilities and programs can be a cost-effective means of reducing motor vehicle emissions." That's what the Air Resources Board Bicycle Fact sheet says. (http://www.arb.ca.gov/planning/tsaq/bicycle/factsht.htm) The same is certainly true for reducing GHG emissions.

There are also very substantial co-benefits from reducing VMT and increasing transit and human powered transportation mode shares. The benefits include a reduction in traffic congestion, improved public health, reduced road maintenance and construction costs, energy savings and environmental benefits.

The health benefits don't derive merely from air quality improvements. There are benefits from reduced traffic collisions. Fewer collisions reduce traffic fatalities, injuries and property damages. These costs are estimated to be more than $164B annually for the U.S. (AAA Crashes vs. Congestion: What's Cost to Society)

There are also costs, estimated by the California Department of

Health Services (DHS) to be $21.7 billion annually, associated with obesity and overweight. Obesity is linked to diabetes. Both these conditions are considered to be epidemics by health care professionals. (See the April 2005 study done for DHS, The Economic Costs Of Physical Inactivity, Obesity, And Overweight In California Adults: Health Care, Workers' Compensation, and Lost Productivity)

Higher levels of physical activity, especially physical activity integrated with everyday activities such as walking and bicycling for transportation, are essential to reducing the incidence of obesity, overweight and diabetes.

Increased physical activity from human powered transportation also reduces the risks of many other diseases including cardiovascular disease (heart disease and stroke), some forms of cancer, Alzheimer's and more. Increased physical activity extends life spans and improves quality of life. (Editorial, British Medical Journal, January 2008)

The environmental benefits of VMT reductions, in addition to the air quality benefits to human health, include reduction in crop damage from air pollution, improved water quality (reduction in oil, brake asbestos dust, etc. in stormwater) and noise reduction. Reduction in suburban growth would preserve crop land and green space and reduce long term energy use.

Section II.A. State as example.
This section mentions alternative commute options, but does not specifically address bicycling. Because of the number of its facilities and employees, the state can do a great deal to make it easier to bike commute by providing showers, clothing lockers and bicycle parking. The CalEPA headquarters building offers a prime example of what can be done. Caltrans is in the process of creating standards for bike facilities at its offices. See http://www.sacbike.org/advocacy/state_bicycle_facilities/ for more information and the rationale for bicycle facility legislation that was considered in 2007. Bicycle facilities could be provided at new and remodeled state office buildings on an administrative basis without the need for legislation,

Section II B. Emission Reduction Measures
The potential for reducing GHG through VMT reduction, and specifically VMT reduction through an increase in bicycling and walking, far outweighs the size of a potential reduction from some other proposed measures, such as from high speed rail. Increasing rates bicycling and walking clearly merits it own section in the list of measures. There are a wide variety of ways to achieve increased rates of bicycling and walking. They include: implementing the Complete Streets concept, speed limit policies and laws, Safe Routes to School programs, increased state and local bicycle and pedestrian funding and incentives, land use policy and incentives, parking charges, adding teeth to parking cash-out law (see Appendix A.), broader implementation of parking cash-out and education, enforcement and encouragement programs.

Section II. B. 3. Energy efficiency
Mandatory bicycle facilities (showers, clothing lockers and bicycle parking) should be specifically cited and included in green building standards. For example, currently bicycle facilities are only an option in LEED standards. That option should be made a requirement for all office, commercial and

residential buildings above a certain size.

Section II. B. 12. Local government actions
A far greater reduction in GHG emissions should be expected from local government actions. This section could be made part of a broader and more ambitious VMT reduction section.

Section II. C. 2. Carbon Fees
Carbon fees should take priority over a cap and trade program. Fees are simple. They can be phased in easily and can be made revenue neutral. They are quicker to implement. They are guaranteed to be effective. Fees are more predictable, equitable and comprehensive.

Cap and trade programs are inherently more complicated and their success is less certain based on actual European Union experience. Cap and trade programs are easier to manipulate in an unfair manner.

See: Climate Change: Caps vs. Taxes
http://www.aei.org/publications/filter.all,pubID.26286/pub_detail.asp

Section III Analysis: Costs and Benefits
The analysis fails to take into consideration the non-air quality health benefits mentioned above. There is also no consideration of the congestion benefits of reduced VMT. Congestion costs are described in the Texas Transportation Institute's Urban Mobility Report. The dollar value of congestion and health benefits, plus the environmental and road construction savings, is very substantial and should be calculated and included.

Appendix A
Parking cash-out law with suggested amendments.

Text of Parking Cash-Out Law

§ 43845. Parking cash-out program. California Health and Safety Code.
(a) In any air basin designated as a nonattainment area pursuant to Section 39608, each employer of 50 persons or more who provides a parking subsidy to employees, shall offer a parking cash-out program. "Parking cash-out program" means an employer-funded program under which an employer offers to provide a cash allowance to an employee equivalent to the parking subsidy that the employer would otherwise pay to provide the employee with a parking space.
(b) A parking cash-out program may include a requirement that employee participants certify that they will comply with guidelines established by the employer designed to avoid neighborhood parking problems, with a provision that employees not complying with the guidelines will no longer be eligible for the parking cash-out program.
(c) As used in this section, the following terms have the following meanings:
(1) "Employee" means an employee of an employer subject to this section.
(2) "Parking subsidy" means the difference between the out-of-pocket amount paid by an employer on a regular basis in order to secure the availability of an employee parking space not owned by the employer and the price, if any, charged to an

employee for use of that space.
(d) Subdivision (a) does not apply to any employer who, on or before January 1, 1993, has leased employee parking, until the expiration of that lease or unless the lease permits the employer to reduce, without penalty, the number of parking spaces subject to the lease.
(e) It is the intent of the Legislature, in enacting this section, that the cash-out requirements apply only to employers who can reduce, without penalty, the number of paid parking spaces they maintain for the use of their employees and instead provide their employees the cash-out option described in this section.

Suggested amendments (f) and (g)
(f) Effective January 1, 2010, the penalty for an employer who fails to offer a parking cash-out program required by Section 43845 is $1,000 per month in which the required program is not offered.
(g) An employer who fails to offer a parking cash-out program required by Section 43845 must, retroactive to January 1, 2010, pay employees a cash allowance equivalent to the parking subsidies that the employees did not take. The retroactive cash allowance shall be no larger than the cash allowance the employees would have received had the employer complied with Section 43845.

Related Provisions

Sections 17202 and 24343.5, California Revenue & Taxation Code. Specifies that costs related to a parking cash-out program may be deducted as business expenses for employers.

Section 17090, California Revenue & Taxation Code. States that the cash allowance given to employees must be included in gross income subject to state income and payroll taxes (except any portion used for ridesharing purposes).

Sections 65088.1, 65089, and 65089.3, California Government Code. Requires (1) congestion management agencies to consider parking cash-out when developing and updating the trip reduction and travel demand elements of their congestion management plans, and (2) requires cities or counties to grant appropriate reductions in parking requirements to new and existing commercial developments if they offer parking cash-out programs.

Uncodified language:

The Legislature hereby finds and declares all of the following:
(a) Existing local, state, and federal policies tend to encourage the provision of subsidized parking by employers.
(b) Subsidized parking creates a strong incentive for employees to commute to work in a single occupancy vehicle.
(c) Commuting in a single occupancy vehicle contributes to traffic congestion and air pollution.
(d) In Los Angeles and Orange Counties, more than 90 percent of the commuters receive free worksite parking, but less than 10 percent of employers provide an employee ridesharing or transit benefit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-21 16:47:36

No Duplicates.

Comment 17 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Darrell
Last Name: Cozen
Email Address: mem4321@aol.com
Affiliation: American Planning Association

Subject: Transit Use
Comment:

```
More efforts should be made to increase usage of mass transit
rather than automobiles to get to work, shop, and play.  Increase
gas taxes to pay for more transit improvements and reduce vehicle
miles traveled.

Thanks.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 08:54:25

No Duplicates.

Comment 18 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Levin
Last Name: Nock
Email Address: Lnock@comcast.net
Affiliation:

Subject: Pedestrians and Bicyclists reduce VMT.
Comment:

California has beautiful weather, beautiful scenery, and many flat areas. With Smart Growth urban planning and better ped/bike infrastructure, California could be one of the most wonderful places in the world to ride a bicycle. Davis, CA provides a superb local example of how suburban VMT can be significantly reduced, with smart land use planning and attention to ped/bike infrastructure.

You can reduce VMT by 30% or more by providing pedestrians and cyclists with safe routes to travel, and convenient destinations to travel to. Transportation planning procedures should be modified, to acknowledge the fact that pedestrian, bicycle, and transit trips can replace Vehicle Miles Travelled, when land use and transportation policies support this.

James Goldstene, ARB executive officer, told the New Partners for Smart Growth this year (2008) that urban households generate half as much VMT as those living in conventional suburban locations. Even households in “smarter growth suburban” locations drive 18 to 39 percent less, according to his presentation.

If California follows 'business as usual' transportation analysis until 2020, reaching 2050 GHG goals will be extremely difficult. If California institutes innovative transportation analysis, such as is being developed in Florida, with active programs to convert VMT to BTC and PTC (bike trips completed and pedestrian trips completed), then 2050 GHG goals will be much more achievable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 11:22:11

No Duplicates.

Comment 19 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Deb
Last Name: Hubsmith
Email Address: deb@saferoutespartnership.org
Affiliation: Safe Routes to School National Partnersh

Subject: Comments on the Scoping Plan for AB32
Comment:

```
The Safe Routes to School National Partnership respectfully submits
the attached letter of comments and recommendations for the scoping
plan for AB32.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/19-srtsnp_carb_ab32_7_24_08_final.pdf

Original File Name: SRTSNP_CARB_AB32_7_24_08_FINAL.pdf

Date and Time Comment Was Submitted: 2008-07-24 10:07:10

No Duplicates.

Comment 20 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Pam
Last Name: Brady
Email Address: president@capta.org
Affiliation: California State PTA

Subject: AB32
Comment:

```
Please see attached letter.
Pam
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/20-lettertocaairresourcesboard.pdf

Original File Name: LettertoCAAirResourcesBoard.pdf

Date and Time Comment Was Submitted: 2008-07-24 17:15:07

No Duplicates.

Comment 21 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: chris
Last Name: davis
Email Address: cmdsaferoutes@earthlink.net
Affiliation:

Subject: ab32
Comment:

July 25, 2008

California Air Resources Board:

I am a member of the Safe Routes to School National Partnership, writing to submit comments on the California Air Resources Board's (ARB) draft scoping plan for AB32, which is being designed to reduce greenhouse gas emissions in the State of California to1990 levels by the year 2020.

My comments focus on the transportation sector, which accounts for approximately 38% of greenhouse gas emissions in the State of California. While we are pleased that the ARB asks for the development of regional plans that will document and reduce greenhouse gas emissions (GHG) emissions, we feel that your target for land use, (2 million metric tons) is quite low, as this represents less than 1% of the overall GHG emissions reductions. This land use target is not at all proportionate to its share of GHG emissions within the transportation sector.

The Partnership is particularly interested in having the scoping plan be amended to include a specific focus related to schools which play a major role in how communities are designed, and how local traffic is generated, with its corresponding vehicle miles traveled (VMT) and carbon emissions.

1) Land Use and VMT: name of organization asks that you increase requirements in the scoping plan for GHG reductions through the land use sector, and make tracking vehicles miles (VMT) traveled and targets associated with VMT reductions a requirement through new regional land use targets. We also ask for you to require that regional transportation agencies include school siting and Safe Routes to School as components of their GHG reduction plans, and create an enforcement mechanism around these GHG reduction plans.

2) Safe Routes to School: We further ask that ARB include Safe Routes to School infrastructure and non-infrastructure programs in the section of the scoping plan titled "public education and programs to reduce vehicle miles traveled" so that the program can be expanded to all elementary and middle schools in California. Include a sentence about your organization's work with Safe Routes to School and any data you might have generated related to mode shift. The Safe Routes to School National Partnership has calculated that if every school in the state currently operated a

Safe Routes to School program that this could annually reduce 468,156 tons of CO2, and create an annual reduction of 1,099,357,028 VMT through school trips alone. Safe Routes to School programs should be funded from cap and trade allowance allocations or other new revenue sources committed to reducing CO2 emissions at a rate of $90 million/year which will be matched through federal and local funding. The state should also require VMT reduction targets related to SRTS in the regional land use plans.

3) School Siting: In addition, ARB should work with the California Department of Education (CDE) on the revision of their school siting requirements (Title 5) which are being updated now to ensure that CDE is encouraging neighborhood schools, and specifically mention the importance of school siting and neighborhood schools within the final Scoping Plan. The National Household Travel Survey indicates that only 42% of school trips are one mile or less in California. As we are building and rebuilding more schools in this state, it will be important to ensure that these new schools are neighborhood schools, where children can safety walk and bicycle as walking and bicycling to school decreases dramatically as residents are located further from schools.

Safe Routes to School and school siting are important issues to include within the scoping plan both for funding allocations through the cap and trade program, and as requirements for the regional target plans.

The State of California should not focus only on technological solutions to reduce GHG emissions. Without improved land use, increased VMT will prevent us from achieving the 2020 emissions reduction goals. Additionally, funding school-oriented programs that promote walking and bicycling will have co-benefits such as improved land use, healthy lifestyles and reducing obesity-related illnesses that are exacerbated due to a lack of opportunities for safe physical activity.

Thank you for your careful consideration of our comments.

Sincerely,

Chris Davis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-25 10:24:33

No Duplicates.

Comment 22 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Holtzclaw
Email Address: john.holtzclaw@sierraclub.org
Affiliation:

Subject: land use and ZEVs
Comment:

```
.         Include stronger measures to reform land use planning in
ways that reduce vehicle miles traveled.

.         Mandate that auto companies sell hundreds of thousands
of Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 17:49:06

7 Duplicates.

Comment 23 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Carroll
Last Name: Nast
Email Address: cnast@infs.net
Affiliation: Sierra Club

Subject: Community Choice Electricity Aggregation
Comment:

```
Promote and enable Community Choice Electricity Aggregation (CCA),
which lets communities pool their buying power to generate clean
power.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 22:06:45

No Duplicates.

Comment 24 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Allen
Last Name: Greenberg
Email Address: agcatp2@aol.com
Affiliation:

Subject: Incorporating Pay-Per-Mile Insurance in Transportation Plan
Comment:

```
Dear Sir or Madam:

Please accept the attached research paper, "Designing Pay-Per-Mile
Auto Insurance Regulatory Incentives Using the NHTSA Light Truck
CAFE Rule as a Model," as a regulatory approach that should be
considered in the State of California for promoting pay-per-mile
automobile insurance.  There are very few strategies that would
have nearly the impact as this one in reducing
transportation-sector greenhouse gas emissions and other air
pollution.  While the research paper suggests regulatory
incentives be created at the Federal level, it acknowledges the
possibility of similar state-level regulations, which is what I am
urging be considered in California.

Thank you,
Allen Greenberg
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/26-paydinsuranceregincentiverationalev4.doc

Original File Name: PAYDInsuranceRegIncentiveRationaleV4.doc

Date and Time Comment Was Submitted: 2008-07-29 07:13:36

No Duplicates.

Comment 25 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Kim
Last Name: Floyd
Email Address: kimffloyd@fastmail.fm
Affiliation:

Subject: Off Road Vehicle Emissions
Comment:

```
All Off Road vehicles should be require to comply with strong
pollution controls.  This should include all water crafts,
motorcycles, dune buggies, ATV, ETC.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 11:34:15

No Duplicates.

Comment 26 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Samantha
Last Name: Kaplan
Email Address: earthexperienceart@yahoo.com
Affiliation:

Subject: A hope for climate crisis solutions
Comment:

```
I believe these additional measures will greatly augment the
positive changes that this bill is creating.

Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid low-income
consumers. Limit sharply and verify any offsets. Do not link our
program to any states with weaker emission standards.
·        Include stronger measures to reform land use planning in
ways that reduce vehicle miles traveled.
·        Promote and enable Community Choice Electricity
Aggregation (CCA), which lets communities pool their buying power
to generate clean power.
·        Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.
·        Put Zero Waste front and center:  increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 14:42:34

No Duplicates.

Comment 27 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: David
Last Name: Merritt
Email Address: gurudave@att.net
Affiliation:

Subject: Don't Limit Production of Zero-Emission Vehicles
Comment:

```
The ARB has set a very low minimum production goal for ZEVs. Is
this a replay of "Who Killed the Electric Car?"  If you're bowing
to industry pressures--don't, they're not even American.  The
automobile industry and the oil industry are international and
have no commitment to the welfare of Californians other that to
keep them as customers.  They need us, not vice versa.  Set a much
higher minimum production goal--say 50,000 vehicles.  Californians
will snatch them up--just like they did the last time around.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 15:56:43

No Duplicates.

Comment 28 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Cathy
Last Name: Haagen-Smit
Email Address: tandems2@sbcglobal.net
Affiliation:

Subject: VMT Reduction
Comment:

As a long time bicycle advocate, I have the following comments about the scoping plan:

REDUCE VMTs.
Clearly VMT is out of control in this state. ARB has noted a trend for increased VMTs over the next 50 years. Of course this trend must not only be slowed down, it should be reversed starting sooner than later. (App C, page C-22). I ask for strong emphasis on the issues below:

1. Public Education: ARB has suggested providing consumer choices. Strong marketing, much like the state's "Flex Your Power" campaign, catching consumer's attention should be created. The bicycle as a solution should be emphasized. Cheap, easy, healthy.
2. Incentives or feebates or tax relief should be extended to individuals who ride a bicycle or walk to reduce vehicle trips, not just to those driving more fuel efficient cars. The converse, people who continue to drive when certain trips could be replaced by walking, biking or transit should be penalized, or given disencentives. Pay to park, for example.
3. Programs requiring employers to help employees reduce VMTs should be mandated.
4. Local governments and transportation planning agencies should be penalized for poor land use planning. All planning decisions must meet certain strict blueprint criteria before any new road, subdivision or strip mall is built. Decision makers are getting away with the worst case scenarios.

I live in Placer County which suffers from extremely bad, car-based planning. If there was an economic disencentive for the decision maker, carbon footprints would be reduced dramatically. Many decision makers simply scoff at the notion of global warming. They hold key positions in determining a future of reduced greenhouse gas emissions. There need to be penalties for their failure to act.
Thank you,
Cathy Haagen-Smit

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 16:18:39

No Duplicates.

Comment 29 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Lynn
Last Name: Davis
Email Address: fordmk2@aol.com
Affiliation: Sierra Club

Subject: OHV regulation; CECP implementation & enforcement
Comment:

OHV emissions (with the exception of spark arresters) are currently unregulated in California. In a State which regulates nearly every type of motorized equipment, from road vehicles to weed trimmers, the omission of this category of vehicle from emissions standards is either an incredible oversight or the result of a highly effective lobby. Annual OHV use in California produces emissions the equivalent of 500,000 barrels of oil burned, and consumes 26 million gallons of gasoline. The fuel used equates to 1.5 million car trips between Los Angeles and San Francisco. The rapid growth of the OHV industry in California will continue to move these statistics upward, neutralizing gains in other clean air initiatives unless regulated now. I urge the adoption of mandatory registration for all OHVs; emissions standards with mandatory testing to ensure efficacy of CECP standards and application. And I urge that all such standards be as stringent to the industry as the current State standard for automobiles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 04:03:46

No Duplicates.

Comment 30 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Jack
Last Name: Swearengen
Email Address: jcswear@sbcglobal.net
Affiliation:

Subject: Transportation
Comment:

Transportation of people and goods by rail is by far the most productive mode, in terms of energy, labor, or land use per passenger or ton-mile. This means that shifting to rail as the backbone of our transportation system will reduce our use of energy, land, and labor. In turn, the increase in transportation productivity will benefit the rest of the economy.

In the future, electrification of the rail lines can permit powering from renewable sources such as wind, photovoltaics, or cellulose. If carbon sequestration can be made affordable, the electricity can be generated from domestic coal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 08:34:10

No Duplicates.

Comment 31 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Chris
Last Name: Cone
Email Address: cone@sonic.net
Affiliation:

Subject: Lack of Mass Transit Option
Comment:

```
I am curious why the Draft Scoping Plan does not address local mass
transit. High Speed Rail will certainly provide relief along an
important transporation corridor; however, without local mass
transit options we are all still limited to our cars to get to
work, school, and shopping -- even if those cars get better gas
mileage. Why doesn't the plan offer solutions for local mass
transit?
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 10:15:22

No Duplicates.

Comment 32 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Brent
Last Name: Eidson
Email Address: beidson@sandiego.gov
Affiliation: City of San Diego

Subject: Fleet
Comment:

```
The overarching concern is the lack of available technology and the
cost associated with the recommendations.
1) Use of Medium/Heavy Duty Hybrid Vehicles: The bucket trucks
currently run an extra $40-50K per unit.
2) Low emission fuel / oils: Currently these are not readily
available, nor does existing infrastructure support them.
3) Federal or State funding would be needed in order to help
cities comply with the equipment upgrades.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:13:15

No Duplicates.

Comment 33 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Antoine
Last Name: McGrath
Email Address: Antoine.McGrath@gmail.com
Affiliation:

Subject: Auto Pollution and Asthma
Comment:

```
Auto emissions contribute significantly to the pollution in cities
which has a correlation with childhood and infant asthma rates. To
improve the quality of life for future citizens I have suggestions
to incorporate into AB32
-  Make polluters pay for their emissions of greenhouse gases,
using the resulting revenues to promote clean energy and aid
low-income consumers. Limit sharply and verify any offsets. Do not
link our program to any states with weaker emission standards.
-  Include stronger measures to reform land use planning in ways
that reduce vehicle miles traveled.
-  Promote and enable Community Choice Electricity Aggregation
(CCA), which lets communities pool their buying power to generate
clean power.
-  Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not 7500 ZEVs.
Thank you
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:26:28

No Duplicates.

Comment 34 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Edward
Last Name: Mainland
Email Address: emainland@comcast.net
Affiliation: Sierra Club California

Subject: Electrification of Transportation
Comment:

• There is strong support for implementation of the Pavley "Clean Cars" standards which continue to call for reduction of global warming pollution from personal vehicles. While the Pavley standards will allow us to meet 2020 goals for greenhouse gas reductions, in order to meet 2050 goals we need more than that before 2020.
• The state should immediately begin a dramatic shift toward plug-in hybrid electric vehicles and battery electric vehicles to begin the ramp-up needed to meet 2050 greenhouse gas reduction goals. This should be stated specifically in the Plan to make sure it is implemented.
• The state should immediately create a Battery Electric Vehicle Partnership with industry to speed the electrification of the light-duty vehicle fleet, and redirect resources from hydrogen fuel-cell vehicle programs to battery initiatives. Advancements in battery technology and increasing gasoline prices have improved the market for battery electric vehicles, and their benefits in reducing greenhouse gases are proven. Hydrogen fuel-cell vehicles conflict with the Plan's demand for energy efficiency because they require double to quadruple the amount of electricity to operate compared with battery electric vehicles.
• The minimum goal of 7,500 Zero Emission Vehicles (ZEVs) currently required by the Zero Emission Vehicle Program in 2012-2014 is grossly inadequate. CARB should establish a goal of hundreds of thousands of ZEVs in that time frame, and recommend increased funding for immediate development of plug-in hybrid vehicles and infrastructure for all plug-in vehicles.
• CARB should create a program and incentives to encourage conversion of the 100,000 hybrids now in use in the state to plug-in hybrids, and mandate all appropriate state fleet vehicles be plug-in or zero-emission vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 15:53:45

No Duplicates.

Comment 35 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: David
Last Name: Assmann
Email Address: David.Assmann@sfgov.org
Affiliation: City and County of San Francisco

Subject: City of San Francisco Comments on Transportation for the AB 32 Draft Scoping Plan
Comment:

It appears from the appendices (although not at all clear in reading the draft scoping plan), that the target chosen for the local government section is based on regional transportation-related greenhouse gas targets (the appendices go from regional transportation to a target to a list of actions to a discussion of policies to assist local actions). The four other measures under evaluation in the appendices (all transportation measures) are all worthy programs that should also be included in the draft scoping plan. However, only congestion pricing and programs to reduce vehicle trips can truly be implemented at a local government level. Pay as you drive programs cannot be implemented at a local government level alone, and indirect source rules for new development is best implemented at the regional and state level.

In addition to being included in the draft scoping plan, the combined target for congestion pricing and programs to reduce vehicle trips should be higher. The appendices give a potential for entire state of up to 2 MMT for these two areas. San Francisco, with a little over 2% of the state's population, has set a target of 322,000 tons for San Francisco alone – by 2012!

Public education and programs to reduce vehicle travel are effective and continue to be in demand especially with the increase in fuel prices. However, there is a limited amount of funding available to local governments to staff public education activities. Additional resources and funding to staff public outreach programs specific to promoting driving alternatives would be very helpful. In addition, San Francisco recommends that the state adopt the following transportation demand management programs:

• Un-bundle parking (Transit Oriented Development TOD): Paying for parking separately from Housing or Office Space. The cost of parking for residential and commercial units is often passed on to the occupants indirectly through the rent or purchase price ("bundled") rather than directly through a separate charge. Unbundling parking helps reduce vehicle ownership as residents are able to save more by not owning a car and it can complement car-sharing programs. Making it a requirement to un-bundle parking in new developments will reduce the use of vehicles.

• Implementation of Smart Parking Pricing: Incentivize local governments to make Smart Parking Pricing mandatory. This would including the following:

o Charge users directly for parking facility use, often with variable rates. Better parking management yield following benefits:
o Make parking easier to find and easier to pay for.
o Reduce frustrating circling for parking, which means less congestion.
o Reduce transportation-related greenhouse gas emissions.
o Increase safety for pedestrians, bicyclists, and other drivers by helping drivers be less preoccupied by the search for parking.

• Guaranteed Ride Home: Mandate Guaranteed Ride Home (GRH) programs. Also known as Emergency Ride Home (ERH), GRH provides a free or low-cost ride home in cases of emergency for employees who use alternative transportation, such as carpooling, vanpooling, public transit, bicycling, and walking. This program helps promote driving alternatives to commuters who would otherwise drive just to address the possibility of needing their personal automobile in case of an emergency. The City and County of San Francisco currently offers a free Emergency Ride Home program to all SF destined commuters and their San Francisco based employers.

• Mandatory Pre-Tax Transit: Commuters who take the bus, train, ferry, or vanpool to work could be saving up to 40 percent on their commuting expenses. Here's how it works: The federal government allows employees to deduct up to $115 per month from their paychecks, pre-tax, to pay for transit and vanpool expenses. Employees save by using pre-tax dollars for their commute expenses, and employers get the advantage of reduced payroll taxes and a popular benefit program that's easy and inexpensive to administer. Making this program mandatory for employers to offer at their worksite would encourage the use of driving alternatives. The Board of Supervisors at the City and County of San Francisco have been presented with a legislation that would make San Francisco the first City in the nation to make pre-tax transit program mandatory for employers to offer their employees.

• Municipal Bicycle Fleet: Require cities, large corporations and institutions to implement bicycle programs and/or provide incentives for the implementation of shared bicycle fleet for workers to help reduce the need for vehicle pool or fleet for workers to perform on-job duties. This helps reduce vehicle miles traveled and carbon emissions. The City and County of San Francisco has implemented a program for workers who make a significant number of vehicle trips and are able to use a bicycle to perform their on-job duties. The program has been in existence for over four years and currently provides over 400 bicycles to park gardeners, parking control officers, health care workers, city planners, etc.

• Public Bicycle Fleet: Require that large urban areas provide a public bicycle fleet and/or provide incentives to establish such a fleet. Implementation of a shared bicycle fleet for the general public is a great way to promote clean and green transportation option. Paris, France and Amsterdam, Netherlands along with Portland, Oregon serve as a few good examples of shared bicycle fleet programs available to the general public.

• Promotion of Parking Cash-Out: Offers commuter financial incentives for using alternative modes. Free parking is the most

common fringe benefit offered to workers in the U.S. A 1992 California law created a program known as "parking cash-out" that eliminates subsidization of parking for solo drivers. According to University of South Florida’s National Center for Transit Research, with the cash-out programs implemented, the average share of solo commute drivers decreased from 76 percent to 63 percent, a 13 percent decrease.

• Car free Tourism: Encourage car free, carefree transportation to and around California Tourist destinations to promote cleaner air and a healthier planet. San Francisco has started work on its first carfree tourism project that provides the tourist with information (guides, brochures, website) on how to best experience San Francisco by walking, on bicycles and using public transit.

In addition to the Transportation Demand Management programs that can be administered by local jurisdictions, congestion pricing can also help reduce emissions. San Francisco is implementing a $158 million grant designed to combat congestion, which will include congestion pricing on one of the roadways entering the city, and the city is also looking at the potential implementation of toll roads downtown.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 18:22:24

No Duplicates.

Comment 36 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Jim
Last Name: Haagen-Smit
Email Address: jimwhs@yahoo.com
Affiliation: California Bicycle Coalition

Subject: Need stronger measures to increase bicycling
Comment:

The draft Scoping Plan is a good start to reducing greenhouse gas emissions. The California Bicycle Coalition appreciates the language included in the plan in connection with reducing VMTs. However, the CBC asks that it be stronger and include measures to increase bicycling throughout the state.

The CBC is a statewide 501(c)(4) which promotes cycling as a solution to many health problems in California. CBC sees two tools that work to support the AB 32 scoping plan. 1. Reducing VMTs is clearly required. The scoping plan can do this directly by promoting bicycling through marketing and educating the public; increasing the mode split in transportation funding; providing funding or incentives for bicycle trips; requiring local transportation agencies and/or employers to implement trip reduction plans. 2. Reducing VMTs by encouraging people to ride bikes, walk or take transit rather than drive necessitates local governments to make correct land use planning decisions. Land use planners and local governments need incentives to implement or, in the converse, penalties for ignoring blueprint/smart growth scenarios.

Although the draft plan calls for a better regional planning approach, CBC believes that stronger measures are needed to give people more choices to get out of their cars.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 21:05:37

No Duplicates.

Comment 37 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Eric
Last Name: Chase
Email Address: galoisgroupie@gmail.com
Affiliation:

Subject: Increased Emphasis on Transit
Comment:

Thank you for making this very convenient forum available for public comment on the Draft Scoping Plan.

Transportation accounts for about 40% of greenhouse gas emissions in California (here in the Bay Area, about 50%). In order to reduce the contributions of transportation to greenhouse gas emissions, it is critical that aggressive programs be implemented that will reduce vehicle miles traveled. VMT in California is projected to increase about 36% by the year 2020, about 49% by the year 2025, and about 63% by the year 2030. (Source: Caltrans, 2008.)

While high speed rail should have its place on the list of strategies used to reduce greenhouse gas emissions, high-speed rail is not a feasible option for most trips within a metropolitan region, nor is it appropriate for travel within a single city. A focus on high-speed rail at the extent of local transit means that the Draft Scoping Plan does not capitalize on an opportunity to reduce vehicle miles traveled within metropolitan regions. Emissions reduction must be addressed on all levels of travel, including local. Therefore, the list of emissions reduction strategies must explicitly include metropolitan transit systems, which appeared nowhere on the list. Ability of transit to reduce VMT has apparently been severely underestimated, so it is critical that current state budgetary drains on transit be turned around. Federal, state, and local funding must be directed away from roads and toward transit operation and expansion, both to minimize fare hikes in light of rising fuel prices, and to provide additional service that makes transit convenient for a greater number of people. Tools include, but are obviously not limited to:

1. Conversion of existing traffic lanes to HOV lanes, and use of HOV lanes to expand bus rapid transit service.
2. Recognition that LOS degradation in the short-term (e.g. in connection with the conversion of a traffic lane into a transitway or HOV lane) can be beneficial in the long-term, in that congestion provides an incentive for solo drivers to pursue more responsible transportation choices.
3. Implement pedestrian and bicycle programs that encourage increased walking and biking: e.g. Construction of bicycle lane networks. Provide incentives for local jurisdictions to implement street design that maximizes safety of pedestrians and cyclists. Facilitate easier use of bicycles in conjunction with transit systems.
4. Implement congestion pricing to generate revenue that is

funneled directly into transit.
5. Pay-As-You-Drive: If all vehicle costs paid by motorists are narrowly tailored to driving behavior, motorists will pay closer attention to their driving patterns and will have incentive to seek out opportunities to reduce their personal miles-traveled. Insurance payments should be connected to behavior that is in the sole control of the motorist (i.e. distance traveled), and other fees connected with vehicle use should also be assessed according to distance traveled. The extent to which payment amounts depend on miles-traveled should be maximized, so that the motorists are aware that the fees they pay are directly dependent on the extent to which they use the vehicle.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 08:08:24

No Duplicates.

Comment 38 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: paula
Last Name: carrell
Email Address: chacocyn@earthlink.net
Affiliation:

Subject: zero emission vehicles
Comment:

```
Cars, trucks, etc. are, I believe, the biggest emitters of carbon
in California.  We need to clean-up our transportation sector NOW.
 As we all figure out how to drive less, it would also help
immensely to have less polluting vehicles available.  I'd love an
electric car -- an affordable one -- that could be charged with
solar power.  INCREASE THE REQUIREMENT FOR ZERO EMISSION VEHICLES,
please.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 13:04:53

No Duplicates.

Comment 39 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Kirk
Last Name: Marckwald
Email Address: Kirk@ceaconsulting.com
Affiliation: Association of American Railroads

Subject: California Railroad Industry Comments
Comment:

```
The members of the Association of American Railroads -- the Class I
freight railroads operating in California and Pacific Harbor Lines
(the Railroads) -- appreciate the opportunity to provide comments
on ARB's AB 32 Discussion Draft Scoping Plan (the Draft) released
on June 26, 2008. The Railroads commend ARB staff and Board
Members on this initial and comprehensive endeavor to mitigate
California's contribution to global climate change.

Please see the enclosed PDF with our comments on the draft.

Regards,
Kirk Marckwald
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/47-aar_draft_comments_to_arb_draft_scoping_plan_08_0731_final.pdf

Original File Name: AAR draft comments to ARB draft scoping plan 08_0731_FINAL.pdf

Date and Time Comment Was Submitted: 2008-07-31 15:15:14

No Duplicates.

Comment 40 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Anne
Last Name: Geraghty
Email Address: ageraghty@walksacramento.org
Affiliation: WALKSacramento

Subject: Complete Streets, Transportation & Public Health
Comment:

```
Please review attached file for comments.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/48-walksacramento_comment_letter_on_carb_ab32_scoping_plan_7-29-08.pdf

Original File Name: WALKSacramento Comment Letter on CARB AB32 Scoping Plan 7-29-08.pdf

Date and Time Comment Was Submitted: 2008-07-31 20:03:04

No Duplicates.

Comment 41 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Linda
Last Name: Villatore
Email Address: villatore@comcast.net
Affiliation:

Subject: Reduce Speed Limits
Comment:

```
Reducing the speed limit from 65 to 55 on highways under the Carter
Administration in the 1970's has proven to cut emissions
substantially and should be implemented as quickly as possible to
reduce GHG.

Benefits:

Highly effective in reducing GHG
Tested and measured
Immediate positive impact
No cost to consumer
Related benefit to consumer, reduce cost of gas due to higher mpg
at slower speeds.

Negative Impact
Resistance to change
Increased commute time
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 08:26:53

No Duplicates.

Comment 42 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Todd
Last Name: Litman
Email Address: litman@vtpi.org
Affiliation: VTPI

Subject: Pay-As-You-Drive Pricing Analysis
Comment:

The current California draft plan estimates that PAYD could achieve a maximum of 1MMT CO2 emissions reduction. Brookings Institution researchers Jason Bordoff and Pascal Noel estimate much larger impacts in their study, "The Impact of Pay-As-You-Drive Auto Insurance in California" (http://www.brookings.edu/papers/2008/07_payd_california_bordoffnoel.aspx). They estimate reductions of 10.5 MMT based on 2006 levels and 11.8 MMT based on 2020 projections, and using life-cycle analysis, include CO2 emitted in drilling, transporting, refining, and blending PAYD would reduce CO2 emissions by 13.4 MMT based on 2006 levels and 15 MMT based on 2020 projections. This is 10-15 times larger than CARB projections.

The Draft Plan significantly underestimates potential emission reductions because it uses low elasticity values and participation rates. I therefore recommend the following adjustments to the CARB analysis:

First, the short-run elasticity of -0.025 to -0.05 is quite low. Even Hughes, Knittel and Sperling (2006) found somewhat higher short-run fuel price elasticities of -0.034 to -0.077 during 2001-06, and Small and Kurt Van Dender (2005 and 2007) found the gasoline price elasticities was -0.09 in the short run and -0.40% in the long run during 1997-01. Komanoff (2008) estimates that the short-run U.S. fuel price elasticity reached a low of -0.04 in 2004, but this increased to -0.08 in 2005, -0.12 in 2006 and -0.16 in 2007. This suggests that the conditions which resulted in very low price sensitivities during 1985-2005 were anomalies, and that price elasticities are likely to return to more normal levels. I therefore recommend using a range of -0.05 to -0.20 for the short-run and 0.2 to -0.6 in the long-run.

References:
Jonathan E. Hughes, Christopher R. Knittel and Daniel Sperling (2006), "Evidence of a Shift in the Short-Run Price Elasticity of Gasoline Demand," National Bureau of Economic Research, Working Paper No. 12530 (http://papers.nber.org/papers/W12530).

Charles Komanoff (2008), "We Explain Gasoline Demand (including why it’s sticky)," Carbon Tax Center (www.carbontax.org); at www.carbontax.org/blogarchives/2008/05/12/we-explain-gasoline-demand-including-why-its-sticky
.

Todd Litman (2008), "Transportation Elasticities: How Prices and Other Factors Affect Travel Behavior," Victoria Transport Policy Institute (www.vtpi.org); at www.vtpi.org/elasticities.pdf.

Kenneth Small and Kurt Van Dender (2005), "The Effect of Improved Fuel Economy on Vehicle Miles Traveled: Estimating the Rebound Effect Using U.S. State Data, 1966-2001," University of California Energy Institute's (UCEI) Energy Policy and Economics Working Paper Series (www.ucei.berkeley.edu); at www.ucei.berkeley.edu/PDF/EPE_014.pdf.

Kenneth A. Small and Kurt Van Dender (2007), “Fuel Efficiency and Motor Vehicle Travel: The Declining Rebound Effect,” Energy Journal, Vol. 28, No. 1, pp. 25-51; at www.econ.uci.edu/docs/2005-06/Small-03.pdf.

Second, it is important to model the impacts of universal PAYD (all insurance is priced by the vehicle-mile), as has been proposed by the National Organization for Women Insurance Project (www.centspermilenow.org). This is justified for the following reasons:

* Insurance is highly regulated for actuarial accuracy, economic efficiency, crash reduction, consumer benefits, and affordability objectives: PAYD helps achieve all of these. Insurance regulators could (I believe should) require universal PAYD based on conventional insurance regulatory objectives (Todd Litman, 2005, “Pay-As-You-Drive Pricing and Insurance Regulatory Objectives,” Journal of Insurance Regulation, Vol. 23, No. 3, National Association of Insurance Commissioners, Spring; at www.vtpi.org/jir_payd.pdf).

* Universal PAYD would be easier and more equitable to implement because it would avoid the complexities and conflicts that would result from self-selection. It is not currently possible to predict which types of drivers, and therefore which risk profiles, would choose optional PAYD, so the insurance industry would need to guess how to respond. To the degree that this complexity is a barrier to PAYD implementation, then universal application to PAYD is an elegant solution.

* Universal PAYD represents the upper-bound travel impacts and benefits (energy conservation, emission reductions, crash reductions, consumer savings, congestion reductions, etc.). Decision-makers should be allowed to consider this option. It would be inappropriate to exclude it from the technical analysis.

I therefore urge CARB to include analysis showing the impacts and benefits (including monetized estimates of co-benefits such as crash reductions, consumer savings and benefits, congestion reductions, road and parking facility cost savings, etc.) that would result from universal, odometer-based, which would include virtually all motorists.

In addition, PAYD insurance is just one of several possible ways to convert fixed vehicle costs into variable costs, thereby increasing transportation system efficiency and equity. Others include distance-based vehicle registration and licensing fees, distance-based purchase taxes and fees, and more mileage-based pricing of vehicle leases, as discussed in the 'Distance-Based

Pricing' chapter of the "Online TDM Encyclopedia" (http://www.vtpi.org/tdm/tdm10.htm). Once a system is established to collect verified annual mileage readings, the incremental costs of these reforms is tiny and they provide additional benefits.

I therefore recommend analyzing the impacts and benefits of additional distance-based vehicle pricing strategies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 10:16:40

No Duplicates.

Comment 43 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Pascal
Last Name: Noel
Email Address: pnoel@brookings.edu
Affiliation: Brookings Institution

Subject: The Impact of Pay-As-You-Drive in California
Comment:

```
Dear Sir or Madam,

Please accept the attached research paper, "The Impact of
Pay-As-You-Drive Auto Insurance in California," which we recently
completed at the Brookings Institution's Hamilton Project.  We
hope this may assist you in your efforts to analyze the impacts of
proposed PAYD measures on "the economy, public health, and the
environment, including effects on low-income communities."  We
have used data at the household and vehicle level in California to
estimate the environmental, economic, and distributional impacts of
PAYD.

The report is also available through the following link:

http://www.brookings.edu/papers/2008/07_payd_california_bordoffnoel.aspx

Thank you,

Jason Bordoff and Pascal Noel
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/51-payd_california_bordoffnoel.pdf

Original File Name: PAYD_california_bordoffnoel.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:07:23

No Duplicates.

Comment 44 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Pat
Last Name: Flanagan
Email Address: paflanagan29@verizon.net
Affiliation: The Mojave Desert Land Trust

Subject: ORV Emissions
Comment:

The Mojave Desert Land Trust (the Land Trust) appreciates the commitment shown by the Air Quality Board to develop a comprehensive approach to address climate change. However, from our prospective gained conserving land that protects ecosystem functioning in the Mojave Desert, the omission of off-highway vehicles emission control from the transportation plan is a serious oversight.

Off-highway vehicles produce significant greenhouse gases. According to Fuel to Burn: The Climate and Public Health Implications of Off-Road Vehicle Pollution in California, prepared by the Center for Biological Diversity and the Clean Air Initiative, a project of the American Lung Association of San Diego and Imperial County, off-highway vehicles emit more than 230,000 metric tons – or 500 million pounds—of carbon dioxide into the atmosphere each year. This is equivalent to the amount of gasoline used by 1.5 million car trips from San Francisco to Los Angeles.

California Air Resources Board research finds that off-highway vehicles and all-terrain vehicles produce 118 times as much smog-forming pollutants as do modern automobiles on a per-mile basis. California has among the poorest air quality in the nation and is home to 13 of 20 counties nationwide most at risk to adverse health impacts from smog. In Imperial County one of the most popular off-highway vehicles recreation destinations in the state, air pollution contributes to the high rate of asthma, bronchitis, pneumonia, and allergies in this region, especially among children younger than 14 years old.

Joshua Tree National Park experiences the highest ozone pollution level of any Park in the country. Both Joshua Tree and its neighbor to the north, the Mojave National Preserve post alerts warning travelers and staff of the severity of health threats from poor air quality. Research indicates that unless current trends change, climate change may eliminate 90% of Joshua trees from its namesake park by the end of this century while automobile pollutants promote the growth of invasive weeks and grasses, which contribute to wildland fires.

The mandate to reduce greenhouse gas emissions by the Global Warming Solutions Act applies to all gas sources, including off-highway vehicles. It is the responsibility of California to ensure that emissions from this source are reduced at the same pace as other sources. The Land Trust concurs with the authors of

Fuel to Burn that, at a minimum, emissions from off-road vehicles should be reduced to at least 1990 levels by 2020 with further reductions to 80 percent below 1990 levels by 2050.

Thank you for this opportunity to comment. We appreciate you website – it is a very effective tool for commenting.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:27:37

No Duplicates.

Comment 45 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Kurt
Last Name: Blase
Email Address: kblase@nossaman.com
Affiliation: Center for N. American Energy Security

Subject: LCFS
Comment:

```
Comments of the Center for North American Energy Security are
attached.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/53-final_ab32_scoping_plan_comments_and_attachments.pdf

Original File Name: Final AB32 Scoping Plan Comments and Attachments.pdf

Date and Time Comment Was Submitted: 2008-08-01 13:34:12

No Duplicates.

Comment 46 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

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

Subject: State Transportation Policy
Comment:

The Transportation Solutions Defense and Education Fund, TRANSDEF, has actively advocated for the regional planning of land use, transportation and air quality for the past 15 years. With mobile sources being the biggest emissions category in the State's GHG inventory, we recognize that modifying transportation policy is absolutely crucial to the success of the Scoping Plan. But the Plan has little to offer in this area.

Transportation Policy
We participated in the LUSCAT process as well as the California Transportation Commission's Working Group on climate change additions to the Regional Transportation Plan Guidelines. These processes determined that a central part of the implementation of AB 32 must be a reduction in Vehicle Miles Travelled (VMT). The Bay Area's Joint Policy Committee adopted a Climate Change Plan in which "Reducing Driving" was a central strategy. We are disappointed that the otherwise excellent Draft Scoping Plan is largely silent on this focus.

The concern, of course, is that the Business As Usual trend for statewide VMT will overwhelm any successful efforts at GHG reductions. Changing that trend will require a profound shift in how Californians get around. TRANSDEF recognizes that change of this magnitude is politically challenging. What is not clear from the text of the Plan is whether its authors have made the delicate political decision to not broach these issues at this time. If that is the case, we think the political calculus deserves a public airing. Implying that Californians can get through the challenges of climate change by retrofitting a few CFLs does them a disservice. Very difficult choices face our State, and the sooner we start changing how our billions of dollars of infrastructure funds are spent, the sooner we will have viable lower-carbon alternatives to driving.

California needs to dramatically change its priorities in transportation funding. We need to stop building highway capacity to accommodate growth in demand for single-occupant driving. Instead, we need to start pricing highways to provide appropriate economic incentives to discourage single-occupant driving, and to encourage carpooling, walking, biking and using transit. We need to invest the savings from ending highway construction, as well as the proceeds of congestion pricing, in cost-effective transit networks, including a system of subsidies to enable low-income people to maintain mobility.

The problem is that the State's transportation policy is focused on reducing traffic congestion. As a result, many billions of dollars are programmed to widen highways. These projects will result in easier driving conditions (although the construction impacts will make driving harder temporarily), which will result in increased VMT. Before the State can achieve any significant long-term reductions in GHGs, it will need to revisit the mission of the Department of Transportation, and completely revamp its focus. The day-in day-out efforts of Caltrans consistently result in more VMT and more GHGs. Until Caltrans is formally assigned a new mission, its ongoing operations will keep making the State's emissions worse.

Instead of widening highways, an entirely different policy direction is possible--one which makes transit readily available and creates economic incentives to use it. Our website, www.transdef.org contains an extensive discussion of the Smart Growth Alternative we created, which was modelled in the EIR for the Bay Area's 2005 Regional Transportation Plan. Having struggled with the issue of highway vs. transit orientation for the past 15 years, we are extremely well aware of the resistance of local government, not to mention regional government, to dropping already-programmed "improvement" projects. However, given the State's financial constraints, it should be obvious to anyone that the State cannot afford to keep widening highways if it wants to build up the capacity of transit to become a significant part of the State's transport system.

If the State wanted to make a maximum effort to reduce GHGs, it would re-program the STIP and Proposition 1B Bond proceeds currently assigned to highway projects over to the capital needs of improved transit. It would create new climate change fees and offsets, which will create major new sources for transit operations funding, the shortage of which is consistently the biggest obstacle to expanding transit service. Obviously, change of this magnitude would require the creation of a strong political consensus around the need for such comprehensive solutions. We raise these comments to stress the point that the problem in achieving substantial long-term GHG reductions in the transportation sector is primarily a political one, rather than a technical one.

High Speed Rail

TRANSDEF is a strong supporter of High Speed Rail for California, but is troubled by the inability of the High Speed Rail Authority to produce a credible environmental document and business plan. We are part of an environmental coalition that will soon file suit to challenge the FEIR for access to the Bay Area. We are concerned that HSR planning to date has served development interests and not the goal of achieving optimal GHG emissions reductions.

The State needs to support High-Speed Rail as the future armature tying together its regions. This system needs to become the default mode of choice for interregional travel. It will also provide the infrastructure for extensive networks for intraregional travel. The development of High-Speed Rail needs to impose minimum density zoning guidelines as the requirement for station siting, to catalyze a densification of future growth around station areas, and a development focus on urban cores.

Other Measures Under Evaluation

We strongly believe the Transportation Measures Under Evaluation

to be essential to the creation of a more sustainable transportation system--one that provides strong economic signals to both encourage lower-carbon approaches and discourage Business As Usual. We find the emissions reduction entries on Table 22 for these measures to be extremely conservative. This is where much of the 35 MMT of Additional Emissions Reductions from Capped Sectors could come from. We urge CARB to bring these measures forward in the Final Scoping Plan as appropriate for implementation.

Consistent with the National Surface Transportation Policy and Revenue Study Commission's recommendations, we support the tolling of interstate highways in congested metropolitan areas. This would both open a new revenue source, to replace shrinking gas tax revenues, and provide incentives to peak period drivers to shift to transit, carpooling and off-peak auto travel, thus reducing peak period traffic congestion and GHG emissions. (See pages 5-24 through 5-28 of:
http://www.transportationfortomorrow.org/final_report/pdf/volume_2_chapter_5.pdf
)

We are enthusiastic about the potential for Pay as You Drive auto insurance to reduce VMT. Feebates will be excellent incentives to steer purchasers towards lower-carbon emitting vehicles.

We believe 'Public Education and Programs to Reduce Vehicle Travel' to be worthwhile, but very weak in comparison to the billions of dollars the State spends annually to make driving easier. Such a program would need much higher visibility than it received in the Draft Plan to have any effect at all. If such a program were made the centerpiece of the transportation sector program, it would help call attention to its inherent conflict with where the State spends its transportation money.

For years, we have been advocating that Indirect Source Rules, including Mitigation Fees, are needed to correct a tremendous failure of market economics: greenfield development is much more profitable than infill development, yet creates vastly more environmental impacts. If the economic playing field were levelled through ISR mitigation fees, sprawling subdivisions would not be attractive to developers, and new investment would pour into downtown areas with transit, where the impacts will be much less.

TRANSDEF's Own Strategies

TRANSDEF has come before the Air Resources Board several times to ask the agency to adopt a list of Transportation Control Measures that it finds to be Reasonably Available. Unfortunately, VMT reduction was not seen back then as an area CARB felt comfortable in. The recognition of human-caused global warming, and the accompanying need to reduce VMT, should change that.

Because the California Clean Air Act requires non-attainment areas to adopt all feasible control measures, TRANSDEF believes this to be the most direct regulatory route to an effective VMT reduction program. Once CARB adopts a list of reasonably available TCMs, air districts will then be required to implement them in their air quality plans. We would be pleased to discuss innovative TCM concepts in detail with CARB.

Here is one: Adoption of mitigations for increases in trip generation and GHG emissions as part of the conditions of local

project approval. These should include best management practices in parking, including parking pricing, parking cash-out, ecopasses, car sharing, unbundling of parking from leases and real estate purchases, and committed funding for shuttles.

Here is another: The single most effective VMT reduction measure in California has been the Employee Trip Reduction Ordinance. Unfortunately, the Legislature rescinded the authority of air pollution control districts to impose such ordinances when it adopted Health & Safety Code Section 40717.9, enacted as SB 437. To implement effective strategies to reduce employee commute trips, the Scoping Plan needs to ask the Legislature to revisit this issue.

TRANSDEF recommends shifting as much goods movement as possible to rail, as a means of reducing GHG emissions. This could be encouraged by offering State funding for capital improvements through GHG offset programs and regional transportation plans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 14:45:46

No Duplicates.

Comment 47 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Carol
Last Name: Misseldine
Email Address: cmisseldine@comcast.net
Affiliation:

Subject: Comments on Transportation Sector
Comment:

```
Green Cities California (GCC) comments on the Transportation Sector
of the AB 32 Draft Scoping Plan attached.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/55-gcc_transportation_sector_comments.ab_32_draft_scoping_plan.doc

Original File Name: GCC Transportation Sector Comments.AB 32 Draft Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-08-01 15:19:33

No Duplicates.

Comment 48 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Jonathan
Last Name: Morrison
Email Address: jmorrison@cncda.org
Affiliation:

Subject: Transportation Sector Comments
Comment:

```
Please find attached the comments of the California New Car Dealers
Association (CNCDA) on the Draft Scoping Plan's Transportation
Sector Section.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/56-cncda_scoping_plan_comments.pdf

Original File Name: CNCDA Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:46:00

No Duplicates.

Comment 49 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Keith
Last Name: Adams
Email Address: adamskb@airproducts.com
Affiliation: Air Products and Chemicals

Subject: Comments on Low Carbon Fuel Standard
Comment:

```
Air Products encourages CARB to consider facility-specific process
efficiency in determining the CO2 intensity of the fuels produced.
 Use of generic emission factors for refinery process inputs
reduces the incentive for those refiners who implement the most
comprehensive energy and process efficiency improvements.
Encouraging such efficiency improvements is consistent with CARB's
climate change and air quality objectives, and should be supported
through all the emission reduction measures considered.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:00:13

No Duplicates.

Comment 50 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Don
Last Name: Willenburg
Email Address: dwillenburg@gordonrees.com
Affiliation:

Subject: Less Car Traffic - More Bicycles and Public Transportation
Comment:

Reduce Greenhouse Gases, and Achieve Other Benefits, by Alternatives to Cars

Under the Global Warming Solutions Act of 2006, California is to reduce its greenhouse gas emissions to 1990 levels by 2020. This is a noble goal. The 93-page draft "scoping plan" about ways to help lower the state's greenhouse gas emissions contains many good ideas but misses others.

Tellingly, Page 2 – the first page after the pretty cover - and at least four other pages of the report are marked "This Page Intentionally Blank," an inexplicable waste of paper (and the water to produce it, and the energy, and the associated greenhouse gases) in a document ostensibly about "greening" California. Unfortunately, there are some inexplicable blanks in the analysis as well, with even more serious consequences.

The draft plan identifies the main greenhouse gas culprit. Like President Bush and Osama bin Laden, however, the scoping plan pays lip service to arresting that culprit, but rather than doing so instead vents on easier targets and asks for as little sacrifice and change by the population as possible.

The main culprit: transportation (read: cars). The draft plan acknowledges that transportation is the single largest contributor in the state, accounting for 38 percent of greenhouse gas emissions. But the plan does not address the reduction of car traffic except incidentally, such as a factor in planning new community developments. Instead, the plan pins all hope on lighter-carbon fuel and more fuel-efficient vehicles. All to be hoped for and worked toward, but population growth alone is likely to outstrip many such efficiency gains in vehicles. Further, increased car traffic has a variety of other negative impacts, including: increased road construction and maintenance costs; time wasted in traffic; traffic fatalities and injuries (one of many sad facts: Auto accidents are the No. 1 cause of death for U.S. children ages 3-14); the tens of thousands of dollars many consumers must spend on fuel and maintenance and repair and insurance rather than food, housing, medicine, college and investments. Some of these, of course, have greenhouse gas issues themselves (e.g., road construction).

The draft plan avoids the words "public transportation" all together, and mentions bicycles only as an aside. These are two proven methods for reducing car traffic. Taking public transportation rather than driving greatly reduces per capita greenhouse gas emissions. Bicycles involve zero greenhouse gas emissions (at least once they have been built and delivered to the store).

The scoping plan's failure to feature these as means of reducing greenhouse gases is inexplicable other than to say: business as usual, cars uber alles. "Trust in the same market forces that got us into this mess to get us out. Consumers need do nothing but wait for the market to provide the solution. The answer lies in: shopping! Until then, and after then, keep driving."

The plan should, instead, set real goals for investment in public transportation. The plan should also endorse policies like those embodied in the Congressional resolution (Resolution 305, see below) sponsored by Rep. Earl Blumenauer, D-Ore., which calls for increased and improved bicycling programs at the local, state and national levels. "If you build it, they will come." If we build roads, there will be more cars. If we build bike trails and bike routes on traffic streets, there will be more bicycle riders. Ask people in Davis, or Santa Monica, or Berkeley, or Sausalito, or anyplace else it has happened. In San Francisco, for example, the number of bicyclists using a street increases as much as 300 percent when a bike lane is striped. In Portland, Ore., bike ridership is up 400 percent after such improvements. In Minneapolis, after investment in nonmotorized infrastructure, almost 20 percent of all trips are now walking or by bike. Imagine if that were true in Los Angeles.

Blumenauer's resolution (which has passed the House and is awaiting Senate approval) recognizes that many car trips are only a mile or two – distances most everybody could cover in a bicycle, with multiple benefits. Not the least of which is reduction in greenhouse gases.

The scoping plan could and should call for funding and incentives to create more bicycle trails and routes; to allow and facilitate bicycles aboard rail and bus systems; to provide safe bike parking at destinations; to put a bike or bike/ pedestrian lane on all portions of all major bridges in the state.

The scoping plan also goes after other big players in the greenhouse gas arena, and in fairness, it should. No one sector - - industry, buildings, agriculture, water, etc. - - should either escape or bear the brunt of new regulation. But failure to address transportation issues by reducing car use, in favor of wishful thinking that technology will solve everything (Just wait for the new generation light bulb! Just wait for the new generation car engine!) disserves the goal of the scoping plan and California legislation.

The draft scoping plan is a worthwhile start down a necessary path. But it – and we – cannot simply ignore known, effective answers to the single largest greenhouse gas problem in the state and hope to achieve the goal of greening California.

Don Willenburg
1137 Hyde Apt G
San Francisco, CA 94109
A version of the above published in the Daily Journal 7/31/08
This article represents the views of the author and not necessarily those of his employer or any of its clients.
Below: the text of the Congressional resolution encouraging bicycling

Recognizing the importance of bicycling in transportation and recreation. (Referred to Senate Committee after being Received from House)
HCON 305 RFS
110th CONGRESS
2d Session
H. CON. RES. 305

IN THE SENATE OF THE UNITED STATES
June 2, 2008
Received and referred to the Committee on Commerce, Science, and Transportation

---

CONCURRENT RESOLUTION

Recognizing the importance of bicycling in transportation and recreation.

Whereas a national transportation system conducive to bicycling produces enriched health, reduced traffic congestion and air pollution, economic vitality, and an overall improved quality of living is valuable for the Nation;

Whereas by dramatically increasing levels of bicycling in United States cities tangible and intangible
benefits to the quality of life for cities and towns across the country will be realized;

Whereas we now live in a Nation with 300 million people, and that number is expected to grow to 365 million by 2030 and to 420 million by 2050 with the vast majority of that growth occurring in urban areas with limited ability to accommodate increased motor vehicle travel;

Whereas since 1980, the number of miles Americans drive has grown 3 times faster than the United States population, and almost twice as fast as vehicle registrations;

Whereas one-third of the current population does not drive due to age, disability, ineligibility, economic circumstances, or personal choice;

Whereas the United States is challenged by an obesity epidemic, 65 percent of United States adults are either overweight or obese, and 13 percent of children and adolescents are overweight, due in large part to a lack of regular activity;

Whereas the Center for Disease Control estimates that if all physically inactive Americans became active, we would save $77 billion in annual medical costs;

Whereas over 753 of our Nation's Mayors have signed onto the climate protection agreement of the United States Conference of Mayors urging the Federal Government to enact policies and programs to meet or exceed a greenhouse gas emission reduction target of a 7 percent reduction from 1990 levels by 2012;

Whereas the transportation sector contributes one-third of the greenhouse gas emissions in the United States and passenger automobiles and light trucks alone contribute 21 percent;

Whereas bicycle commuters annually save on average $1,825 in auto-related costs, reduce their carbon emissions by 128 pounds, conserve 145 gallons of gasoline, and avoid 50 hours of gridlock traffic;

Whereas the greatest potential for increased bicycle usage is in our major urban areas where 40 percent of trips are 2 miles or less and 28 percent are less than one mile;

Whereas in 1969 approximately 50 percent of children in the United States got to school by walking or bicycling, but in 2001 only 15 percent of students were walking or bicycling to school;

Whereas as much as 20 to 30 percent of morning traffic is often generated by parents driving their children to schools, and in the United States, motor vehicle crashes are the leading cause of death for children ages 3 to 14;

Whereas many public agencies in cities are using bicycles to deliver critical municipal services, for example, more than 80 percent of police departments serving populations of 50,000 to 249,999 and 96 percent of those serving more than 250,000 residents now have routine patrols by bicycle;

Whereas surveys show that a majority of people want to ride and

walk more but are dissuaded by concern over traffic danger and other barriers, and case studies have shown that when those barriers to bicycling are removed, people start riding;
Whereas investment used for improvements for bicyclists and promoting bicycle use resulted in the quadrupling of bicycle use in Portland, Oregon, since 1994 and a recent report to Congress on the nonmotorized transportation pilot program reveals that 19.6 percent of trips in Minneapolis, Minnesota, are made by biking and walking, reflecting the benefit of initial investments in nonmotorized infrastructure;
Whereas the American bicyclist generates enormous economic returns, in 2006, the national bicycling economy contributed $133 billion to the United States economy, supported nearly 1.1 million jobs across the United States, generated $17.7 billion in annual Federal and State tax revenue, produced $53.1 billion annually in retail sales and services, and provided sustainable growth in rural communities;
Whereas a national network of interconnected urban and rural bikeways can provide valuable community benefits, including low or no-cost recreation and alternative transportation options for people of all ages and abilities;
Whereas mountain biking is an environmentally friendly, healthy nonmotorized outdoor recreation activity that encourages young people to experience our natural world, and engenders community support for preservation of open space;
Whereas each year major charity bike rides in communities across the country raise in excess of $100 million for critical medical research to find cures for life-threatening diseases;
Whereas 57 million adults in the United States bicycle each year, and bicycling and walking currently account for nearly 10 percent of trips and 13 percent of traffic fatalities, yet less than 2 percent of Federal transportation safety funding is currently spent to make bicycling and walking safer; and
Whereas communities across the United States are seeking ways to reduce traffic congestion, improve air quality, increase the safety of their neighborhoods, and decrease petroleum dependence, bicycles offer a simple, healthy, energy-saving alternative to driving: Now, therefore, be it
Resolved by the House of Representatives (the Senate concurring), That the Congress--
(1) recognizes that increased and safe bicycle use for transportation and recreation is in the national interest;
(2) supports policies that--
(A) establish national target levels for increased bicycle use, reduce the number of motor vehicle miles traveled (VMT), improve bicycle safety to be achieved within a specific timeframe, and collect data needed to monitor progress;
(B) increase intermodal travel between public transportation and bicycles;
(C) provide incentives for State and local governments to adopt and implement complete street policies designed to accommodate all users, including motorists, pedestrians, bicyclists, transit riders, and people of all ages and abilities;
(D) encourage bicycle use in communities where significant segments of the population do not drive and where short trips are most common;
(E) expand funding for core Federal transportation programs that support non-motorized infrastructure, education, and encouragement programs by--
(i) safeguarding existing funding sources for nonmotorized transportation from inequitable treatment in the Federal transportation funds rescission process;

(ii) supporting funding for core Federal transportation programs that support nonmotorized travel, including transportation enhancements, safe routes to school, and recreational trails; and
(iii) ensuring that highway safety improvement program funds are spent in proportion to the percentage of bicyclist and pedestrian fatalities in each State;
(F) facilitate the development of a coordinated system of United States bicycle routes across the country that cross state borders and connect metropolitan regions;
(G) create bicycle-friendly Federal land protection legislation, such as national recreation areas, to encourage regulations and management practices for mountain biking as an environmentally friendly nonmotorized use of natural surface trails;
(H) provide flexibility in Federal transportation law that would speed up the delivery of nonmotorized infrastructure without sacrificing necessary environmental protections;
(I) provide Federal tax or funding incentives to--
(i) States that adopt motor vehicle laws that protect the rights of bicyclists to share the road;
(ii) businesses that expand bicycle-friendly programs for their employees;
(iii) the health care industry to develop more member discount programs, that target increased physical activity such as bicycling and walking; and
(iv) provide bicycle commuters the transportation fringe benefits currently provided to people who commute by car or mass transit; and
(J) build upon the `Green the Capitol Initiative' as a model, create and provide an environmentally sustainable and healthy working environment for employees that includes the promotion of bicycling as a transportation alternative;
(3) encourages the Department of Transportation to provide leadership and coordination by reestablishing the Federal bicycle task force to include representatives from all relevant Federal agencies.
Passed the House of Representatives May 21, 2008.
Attest:
LORRAINE C. MILLER,
Clerk.
By Robert F. Reeves,
Deputy Clerk.

Attachment: www.arb.ca.gov/lists/sp-transport-ws/58-reduce_greenhouse_gases_-_carb.pdf

Original File Name: Reduce Greenhouse Gases - CARB.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:03:19

No Duplicates.

Comment 51 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Steven
Last Name: Goetz
Email Address: sgoet@cd.cccounty.us
Affiliation: Contra Costa County

Subject: Transportation
Comment:

The Sector Overview and Emission Reduction Strategies for Transportation includes an evaluation of rail strategies. This evaluation is limited to High Speed Rail, which is contingent on voter approval of a state bond. The Scoping Plan should also evaluate the ability of the current state intercity rail program to provide a rail strategy. Implementation and expansion of intercity rail is not contingent on voter approval, but can be achieved through better coordination of existing state, regional and local transportation revenue available for this purpose. Such coordination is less likely to be achieved without some statewide evaluation of its potential effect on GHG emission reduction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:13:05

No Duplicates.

Comment 52 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Timothy
Last Name: Pohle
Email Address: tpohle@airlines.org
Affiliation: Air Transport Association of America, In

Subject: ATA Comments on the AB 32 Draft Scoping Plan
Comment:

```
Attached please find our letter with the comments of the Airline
Transport Association's comments.  As noted therein, we reserve
the right to comment further as the plan is developed.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/60-ata_comments_on_arb_draft_ab_32_scoping_plan.pdf

Original File Name: ATA Comments on ARB Draft AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:59:27

No Duplicates.

Comment 53 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Karen
Last Name: Del Compare
Email Address: kdcyew@excite.com
Affiliation:

Subject: Support mass transit, plug-in hybrids
Comment:

-Please increase funds and support for mass transit. As fuel prices are increasing and cleaner hybird cars are more expensive, affordable mass transit is the only way to ensure environmental justice. It was shocking to read that your scoping plan did not include public transport (except for the high speed rail which may not even be approved by voters).

- Please support known technologies for vehicles with decreased greenhouse gas (GHG) emissions. This includes plug-in hybrids. Widespread use of this technology could be especially useful when combined with increased use of solar panels. Please consider giving more support to this option and greatly increasing your goal of only 1 million rooftop solar panels.

-Please do more to support walking and bicycling. This would also have health benefits as well

-Consider funding public school buses and transportation. It is not efficient to have each indiviual parent drive their children to school. Also consider funding walking paths (ie. sidewalks) and bike lanes so that children can safely walk or bike to school.

-On page C-22 of your Scoping Plan it says, "traffic at California ports (is) projected to increase by 250 percent by 2020." We should be trying to sustain our local economy, not increasing imports. Please try to think of ways to DECREASE traffic at the ports. Perhaps supporting a "Made in USA" or "Made in California" label campaign could help in this endeavor. A carbon fee for the transportation association with imports also might help. A large part of your plan includes reducing vehicle miles traveled for people. This should also apply equally to goods movement. There is no reason to ship items half-way across the globe if they can be produced locally.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:03:27

No Duplicates.

Comment 54 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Butch
Last Name: Pash
Email Address: SolPowerEV@hotmail.com
Affiliation:

Subject: ZEV Mandate
Comment:

```
Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.

Mandate that all rail locomotives be electric (ZELs) within the
SCAQMD by 2020.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:11:10

No Duplicates.

Comment 55 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Ellen
Last Name: Johnck
Email Address: ellen@bayplanningcoalition.org
Affiliation: Bay Planning Coalition

Subject: Coordination between AB 32 and ARB's Goods Movement Reducti
Comment:

The Bay Planning Coalition is a regional, non-profit membership organization of maritime industry and related shoreline business, local governments, residential and commercial builders, labor unions, recreational users and professional service firms in San Francisco Bay. The Coalition and its member businesses are working very diligently to meet the emission reduction goals for diesel particulate emissions adopted in the ARB's 2006 Goods Movement Emission Reduction Plan and its recent regulations. Our members are carrying out efforts to measure emission sources in the marine sector, to develop plans and identify actions to reduce emissions. this is being accomplished through our local Maritime Air Quality Improvement Plan at the Port of Oakland and also through the partnership the Coalition has established via a MOA with the BAAQMD to conduct a (regional) Bay Area Seaport Emissions Inventory. What we are concerned about is the need for coordination between the two emission reduction programs--Goods Movement particulates and AB 32 GHG. It appears that there are synergies between the two programs, for example, where co-criteria pollutants can be identified. It appears likely that contributions to GHG reductions from the transportation sector have already been initiated under the Goods Movement Reduction program. We would like to discuss this with you and identify how this can be documented and considered under AB 32. We request that the ARB address the coordination between the two programs in the AB 32 Scoping Plan. Sincerely yours, Ellen Johnck, Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:57:36

No Duplicates.

Comment 56 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Simon
Last Name: Mui
Email Address: smui@nrdc.org
Affiliation: NRDC

Subject: NRDC Comments on Transportation in Draft Scoping Plan and Appendices
Comment:

```
NRDC respectfully submits these comments on Transportation in the
Draft Scoping Plan and Appendices.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/64-nrdc_comments_on_transportation_in_draft_scoping_plan_and_appendices.pdf

Original File Name: NRDC Comments on Transportation in Draft Scoping Plan and Appendices.pdf

Date and Time Comment Was Submitted: 2008-08-01 18:11:55

No Duplicates.

Comment 57 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Robert
Last Name: Raburn
Email Address: robertraburn@ebbc.org
Affiliation: East Bay Bicycle Coalition

Subject: Add VMT reduction measures that promote mode shift
Comment:

```
Thanks you for the opportunity to provide the attached comments.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/65-ebbc_ab32_draft_scoping_plan_comments.pdf

Original File Name: EBBC_AB32 draft scoping plan comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 18:17:04

No Duplicates.

Comment 58 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Tom
Last Name: Frantz
Email Address: ini@lightspeed.net
Affiliation:

Subject: waste and goods movement
Comment:

```
These comments are about waste transportation.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/66-goods_movement_ab_32_scoping_plan_comments_tom_frantz.doc

Original File Name: Goods Movement AB 32 Scoping Plan comments Tom Frantz.doc

Date and Time Comment Was Submitted: 2008-08-01 19:48:07

No Duplicates.

Comment 59 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Tom
Last Name: Frantz
Email Address: ini@lightspeed.net
Affiliation:

Subject: Transportation Fuels
Comment:

```
These comments are about the LCFS.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/67-transportation_fuels_ab_32_comments_tom_frantz.doc

Original File Name: Transportation fuels ab 32 comments Tom Frantz.doc

Date and Time Comment Was Submitted: 2008-08-01 19:49:30

No Duplicates.

Comment 60 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Steve
Last Name: Wall
Email Address: swall1374@aol.com
Affiliation: Envirnomental Engineer

Subject: Fuel Efficiency and Aggressive Diving Control Measures
Comment:

```
Fuel Efficiency and Aggressive Diving Control Measures

I see that reducing GHG emissions associated with Aggressive
Driving are discussed but would like to suggest an immediate
option and an alternative near term option  1) Aggressive
enforcement to existing speed limits to lower average speeds and
increase fuel economy and 2) Lower speed limits – where controlled
by the State to lower average speeds and increase fuel economy.

1: Aggressive enforcement to existing speed limits should impact
average speeds and increase fuel economy.   For example where 65
mph limits apply almost no one drives at or even within 5 mph of
the speed limit.   Aggressive enforcement (such as no tolerance
for more than 5 mph over the limit does reduce average speed and
would provide an ancillary benefit of reducing the increasing
trend towards aggressive/unsafe driving and associated risks to
life and injury.

2:  While substantially a federal issue California could lower
state controlled speed limits to further reduce average speeds and
increase fuel efficiency.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 11:40:15

No Duplicates.

Comment 61 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Joyce M
Last Name: Eden
Email Address: comment@sonic.net
Affiliation: West Valley Citizens Air Watch

Subject: Greenhouse Gas Sector 1. Transportation
Comment:

```
GHG  Greenhouse Gas Sectors:

GHG 1. Transportation
West Valley Citizens Air Watch (WVCAW) Comments:

a. The development of high-speed rail lines could and should
include solar panels lining the publicly owned right of way,
except at crossings, and wind turbines where appropriate. These
two nonpolluting, renewable generators of electricity could thus
be tied directly into generating electricity for powering the
trains themselves along their routes. Use of electricity close to
its point of generation, eliminates loses through transport.

Calculations would need to be made, but it is highly probable that
this scenario could generate all the electricity the trains would
need to run, and probably much extra to go into the grid.

It is urged that this be initiated, held and used as public power,
not as private, stockholder, or public-private partnership power. A
mechanism such as the issuance of bonds could fund this public
benefit undertaking. In the middle and long run, this will greatly
benefit both the people of California and its environment and
create stable jobs.

b. The contribution of GHG and toxic air contaminant (TAC)
emissions from diesel trucks is enormous in California and is
known by the State of California as a significant contributor to
the increasing amounts of asthma, cancer and heart attacks. A good
use of carbon fees will be to retrofit diesel trucks especially
high numbers of diesel trucks trips in populated areas, such as
ship yard docks (e.g. West Oakland) and cement quarry and kiln
operations (e.g. Hanson Quarry and kiln in Santa Clara County).

c. Photovoltaic system rebates and subsidies for homeowners, small
businesses, small farms, school districts and municipalities will
create onsite plug-in opportunities for the  upcoming electric
automobiles resulting in a potential significant decrease in GHG
and air pollutants.  (see also the larger discussion on solar in
Sector 3.)
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 11:47:00

No Duplicates.

Comment 62 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Spencer
Last Name: Quong
Email Address: squong@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: Feebates to Reduce GHG Emissions
Comment:

```
A vehicle feebates program is an effective, market based incentive
to reduce greenhouse gas emissions in the Transportation Sector.
Please consider moving feebates from a “Measure Under Evaluation”
to a “Recommended Greenhouse Gas Reduction Measure” for the
reasons discussed in the attached letter.


Spencer Quong
Senior Vehicles Engineer
Union of Concerned Scientists
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/70-ucs_scoping_plan_feebates_transportation_8-01-08.pdf

Original File Name: UCS scoping plan Feebates Transportation 8-01-08.pdf

Date and Time Comment Was Submitted: 2008-08-05 16:59:22

No Duplicates.

Comment 63 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Sabrina
Last Name: Means
Email Address: sabrina@caltransit.org
Affiliation: California Transit Association

Subject: California Transit Association Comments on the Draft Scoping Plan
Comment:

```
Thank you for the opportunity to submit comments on the Draft
Scoping Plan. Please see the attached document which includes the
California Transit Association's comments on the Draft Plan.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/71-california_transit_association_comments_on_ab_32_draft_scoping_plan.pdf

Original File Name: California Transit Association Comments on AB 32 Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-06 11:10:23

No Duplicates.

Comment 64 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Ken
Last Name: Johnson
Email Address: kjinnovation@earthlink.net
Affiliation:

Subject: Pavley II and Feebates
Comment:

```
These comments pertain to two transportation measures identified in
the Draft Scoping Plan: Pavley II and Feebates. My primary
recommendations are:
(1)  Provide missing information in the final Scoping Plan.
(2)  Base the feebate design on clear policy criteria and economic
principles.
(3)  Combine the Pavley II and Feebate program design efforts.
(4)  Consider "zero-cost" feebate options.
...
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/72-kenjohnson_2008_08_07.pdf

Original File Name: KenJohnson_2008_08_07.pdf

Date and Time Comment Was Submitted: 2008-08-07 14:04:43

No Duplicates.

Comment 65 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Daniel
Last Name: Ihara
Email Address: dmi1@humboldt.edu
Affiliation: Humboldt State university

Subject: Ultimate $30 per month savings
Comment:

```
It is not clear (Technical Appendix p. C-24) how the ultimate $30
per month savings figure is obtained from Table C-2.  This key
statistic which is mentioned in the Executive Summary (E-6) and
the Draft Scoping Plan (p. 20 and pp. 53-54) has no citation and
should cite a reference in these two places also.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-09 10:05:56

No Duplicates.

Comment 66 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: William
Last Name: Hammond
Email Address: bill@wilcham.com
Affiliation: Wilcham Industries, Inc.

Subject: NEW FUEL SAVING DEVICE/ COLDFRONT
Comment:

```
Please reveiw our presentaion. We have sent the same clinical data
to several agencies and offices.

William Hammond
President/CEO
Wilcham Industries, Inc.
www.wilcham.com
6711A ARLINGTON AVE.
RIVERSIDE, CA. 92504
951-522-1520
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/74-coldfront_master_8-8-08.ppt

Original File Name: Coldfront Master 8-8-08.ppt

Date and Time Comment Was Submitted: 2008-08-10 09:01:46

No Duplicates.

Comment 67 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Nicole
Last Name: Smith
Email Address: nsmith@lgpatlaw.com
Affiliation: IP Attorney & Concerned Consumer

Subject: Clean Energy Vehicles - Electric
Comment:

Dear CARB:

Thank you for the time and effort put into the Draft AB 32 Scoping Plan. Your efforts put California on the forefront of dealing with the major problems of energy and climate change plaguing us today. Certainly, it is no easy task to create a solution when so little is known about the efficacy, efficiency and long-term viability of possible solutions.

Clean Energy for Transportation: Electric Vehicles

As you know, transportation is the largest single contributor to California's carbon emissions, accounting for circa 40% of the state's emissions. Carbon emissions are reduced by cars using electricity, such as the hybrid gas-electric vehicles. Carbon emissions are reduced further by vehicles using a plug in, hybrid, gas – electric system. Carbon emissions are eliminated completely by all electric vehicles, such as the Tesla and the electric vehicles produced almost a decade ago.

Availability

Currently, no plug-in hybrids are on the market today and no new all-electric cars are available for less than $100,000. None of the existing mainstream car companies currently offer all-electric vehicles. Electric car start-up companies face costs upwards of $500 million which is a substantial barrier to market entry. I urge you to create corporate and consumer incentives and legislation for all-electric vehicles and plug- in hybrids enabling more consumers to afford electric vehicles and promoting the production of more electric vehicles.

Thank you for your efforts in tackling the major problems facing us today. It is my sincere hope that CARB is not swayed by lobbyists promoting red-herring solutions but instead intertwines itself with solutions and research conducted by unbiased sources pointing CARB towards efficient, long-term transportation solutions.

I wish you all the best of luck and wisdom as your actions will have lasting impact.

Sincerely,
Nicole Smith

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-10 21:50:25

No Duplicates.

Comment 68 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Kirk
Last Name: Marckwald
Email Address: darcy@ceaconsulting.com
Affiliation: Association of American Railroads

Subject: Rail Comments on Scoping Plan Appendicies
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/76-rr_draft_comments_to_arb_sp_appendices_08_0811_final.pdf

Original File Name: RR draft comments to ARB SP Appendices 08_0811_final.pdf

Date and Time Comment Was Submitted: 2008-08-11 13:38:40

No Duplicates.

Comment 69 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Patrick
Last Name: Griffith
Email Address: pgriffith@lacsd.org
Affiliation: Los Angeles County Sanitation Districts

Subject: LACSD Comments on the ARB Draft Scoping Plant Transportation Sector
Comment:

```
Regarding the discussion of the Draft Scoping Plan pertaining on
Transportation Strategies, we offer the following comment:


1. Page C-27: The Low Carbon Fuel Standard (LCFS) needs to be
modified to include more credit generation opportunities for
waste-derived fuels especially sewage biosolids, a large potential
energy source.  Please see the LACSD comment letter on this subject
dated July 15, 2008 in the LCFS docket.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 14:11:35

No Duplicates.

Comment 70 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Rahaim
Email Address: cseghers@arb.ca.gov
Affiliation: San Francisco Planning Department

Subject: Climate Change Scoping Plan
Comment:

```
Please see attached letter
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/78-8_01_08_sanfranciscoplanningdepartment.pdf

Original File Name: 8_01_08_sanfranciscoplanningdepartment.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:16:54

No Duplicates.

Comment 71 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Christine
Last Name: Seghers
Email Address: cseghers@arb.ca.gov
Affiliation:

Subject: Higher Priority for VMT reduction in the AB 32 Scoping Plan
Comment:

```
ARB has received 19 letters similar to the attached example
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/79-8_11_08_vmtformletter.pdf

Original File Name: 8_11_08_vmtformletter.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:19:27

No Duplicates.

Comment 72 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Ed
Last Name: Pike
Email Address: ed@theicct.org
Affiliation: International Council on Clean Transport

Subject: ICCT/E2 letter on pay as you drive insurance
Comment:

```
Attached in the ICCT/E2 letter to the California Department of
Insurance supporting Pay as You Drive Insurance, which is relevant
to ICCT's comments at the San Jose AB32 workshop is support of
PAYD.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/80-icct_e2_letter_to_cdi_final.pdf

Original File Name: ICCT+E2 letter to CDI final.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:55:51

No Duplicates.

Comment 73 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Kaltenstein
Email Address: jkaltenstein@foe.org
Affiliation: Friends of the Earth

Subject: Comments to AB 32 Scoping Plan Appendices (Transportation)
Comment:

```
Dear ARB,

   Comments attached regarding Goods Movement GHGs within
Transportation Sector.

Thank you,

John Kaltenstein
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/81-foe_ab_32_transport_comments_aug_11.doc

Original File Name: FoE AB 32 Transport Comments Aug 11.doc

Date and Time Comment Was Submitted: 2008-08-11 16:59:11

No Duplicates.

Comment 74 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Don
Last Name: Anair
Email Address: danair@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: Truck and Goods Movement Comments
Comment:

```
Please find attached comments from the Union of Concerned
Scientists, Natural Resources Defense Council, Environmental
Defense, Sierra Club California, and The Center for Energy
Efficiency and Renewable Technologies regarding the draft scoping
plan section on goods movement and medium and heavy-duty truck
greenhouse gas measures.

Regards,
 Don Anair
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/82-trucks_and_goods_movement_scoping_plan_comments_8-11-08.pdf

Original File Name: Trucks and Goods Movement Scoping Plan Comments 8-11-08.pdf

Date and Time Comment Was Submitted: 2008-08-11 17:24:37

No Duplicates.

Comment 75 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Tim
Last Name: Pohle
Email Address: tpohle@airlines.org
Affiliation: Air Transport Association of America, In

Subject: ATA Comments on the Appendices to the AB 32 Draft Scoping Plan
Comment:

```
Attached please find our letter with the comments of the Airline
Transport Association's comments on the Appendices to the Draft
Scoping Plan.  As noted therein, we reserve
the right to comment further as both the Scoping Plan and the
Appendices to it are completed.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/83-ata_comments_on_appendices_to_draft_ab_32_scoping_plan.pdf

Original File Name: ATA Comments on Appendices to Draft AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-11 17:41:46

No Duplicates.

Comment 76 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Kaltenstein
Email Address: jkaltenstein@foe.org
Affiliation: Friends of the Earth

Subject: Amended Comments re: AB 32 Scoping Plan Appendices (Transportation)
Comment:

```
Dear ARB,
     Please accept these amended comments in place of the comments
submitted earlier today from Friends of the Earth.


Thank you,

John Kaltenstein
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/84-foe_ab_32_transport_comments_aug_11_amended.doc

Original File Name: FoE AB 32 Transport Comments Aug 11 amended.doc

Date and Time Comment Was Submitted: 2008-08-11 18:22:08

No Duplicates.

Comment 77 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 78 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Derek
Last Name: Walker
Email Address: dbwalker@edf.org
Affiliation: Environmental Defense Fund

Subject: EDF - Transportation comments
Comment:

```
Please accept the attached transportation comments from
Environmental Defense Fund on the AB 32 draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/86-edf_-_transportation_comments.pdf

Original File Name: EDF - Transportation comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:05:10

No Duplicates.

Comment 79 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Jim
Last Name: Antone
Email Address: jantone@ysaqmd.org
Affiliation: Yolo-Solano Air Quality Mgmt. District

Subject: Idle Reduction
Comment:

Significant idling of locomotives, both for goods movement and passenger rail continues to be an issue. A priority measure should be to look for alternatives to unnecessary locomotive idling both for freight train and Amtrak locomotives. In addition, electric light rail trains continue to run powered up with internal lights and air conditioning on while resting overnight. Alternatives to these practices should be aggressively explored not only as a GHG reduction measure but as a cost reduction measure as well.

The current statewide diesel truck and bus idling regulation should be expanded to include alternative fueled trucks and buses in addition to diesel vehicles. Unnecessary light duty vehicle idling measures should also be explored.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-12 16:28:14

No Duplicates.

Comment 80 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Daniel
Last Name: Kalb
Email Address: dkalb@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: FEEBATES
Comment:

```
Attached is the revised multi-group sign-on comment letter in
strong support of Feebates as a recommended transportation sector
solution.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/88-feebates_support_group_letter_to_carb.pdf

Original File Name: Feebates SUPPORT Group_Letter to CARB.pdf

Date and Time Comment Was Submitted: 2008-08-13 19:55:30

No Duplicates.

Comment 81 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Stan
Last Name: Haye
Email Address: adit@ridgenet.net
Affiliation:

Subject: Emissions from Off Road Vehicles (orvs)
Comment:

```
Emissions from so called ORVs do not seem to be mentioned in the
plan. These are presently uncontrolled. I believe that in some
places even emissions from lawnmowers are controlled, and it would
seem that emissions from ORVs, although not a large percentage in
the big picture, should be controlled just for equity's sake if
for no other reason.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 09:35:53

No Duplicates.

Comment 82 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John F.
Last Name: Cinatl
Email Address: j.f.cinatl@sbcglobal.net
Affiliation: None

Subject: Transportation & Land Use Elements of Scoping Plan
Comment:

```
I apoligize for not being able to read your whole plan but in
skimming it, and the Table of Contents, it appears that you have
failed to include non-motorized modes of transportation in your
plan (i.e greater use of walking and bicycles).

In regard to bicycles, some comment should be made as the
development of additional bike facilities (bike paths, bike lanes
and bike routes on existing and proposed roadways) and just as
importantly, bike parking facilites at all locations (i.e.
wherever car parking is allowed or planned, bike parking should
also be required).

Much more emphasis also needs to be placed on not moving your car
during the day - i.e. do more walking to local destinations.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 11:16:40

No Duplicates.

Comment 83 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Erik
Last Name: Knutzen
Email Address: thoughtstyle@sbcglobal.net
Affiliation: Los Angeles County Bicycle Coalition

Subject: Bicycles
Comment:

```
California needs to encourage and fund bicycle and pedestrian
oriented design. Right now the transportation emphasis by most
City Departments of Transportation is car-centric in the extreme.
We need to reverse this immediately. More bikes=cleaner air.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 12:53:06

No Duplicates.

Comment 84 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Howard
Last Name: Hackett
Email Address: hhackett1@verizon.net
Affiliation:

Subject: Bicycle has been left out as solution
Comment:

```
Lofty documents are written with prose being the end product.
You left out the NON emission producing bicycle as an important
piece of the puzzle.

Please go back. Re-write this "draft" including feasable
solutions, not just "words"
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 19:29:44

No Duplicates.

Comment 85 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Daniel
Last Name: Drake
Email Address: dan@consortium-strategies.com
Affiliation:

Subject: Immediate impact on Reduced Transportation Emissions:
Comment:

```
My name is Dan Drake - Chief Technical Officer for Consortium
Strategies, LLC. I reside in the East Bay, with our main office in
Las Vegas, Nevada. We provide Environmentally friendly Fuel
Treatments that not only improve fuel economy up to 17-20%, but we
can also reduce the harmful emissions by up 47%. This can be
achieved with Diesel, Bio-Diesel, Gasoline and Bunker fuels. They
are 100% Bio-Renewable, non-toxic & non-flammable.
At this time, we are already working with the State of Montana -
Department of Transportation, as referred to by Montana State
Governor - Brian Schweitzer.
We would like very much to provide our proprietary product "
Milieu Fuel Treatment " to the DOT here in Oakland to demostrate
the immediate impact on Emissions that can be achieved using the
product.
Please feel free to review our website:
http://www.consortium-strategies.com  and to write directly to me
at: dan@consortium-strategies.com

"Together We Can"

Best Regards - Dan Drake
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/93-dd_cs.jpg

Original File Name: DD_CS.jpg

Date and Time Comment Was Submitted: 2008-08-17 16:09:55

No Duplicates.

Comment 86 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Ed
Last Name: Porter
Email Address: eporter95@aol.com
Affiliation: Santa Cruz City Council

Subject: Large potential to reduce ghg emissions ignored in draft
Comment:

```
In Santa Cruz, it is estimated that forty percent of our GHG
emissions come from automobiles. I have seen estimates up to sixty
percent.
Santa Cruz is considering a way to divert a significant number of
our existing auto trips, mostly Single Occupant Vehicles (SOV),
into a clean form of transportation powered by electricity
obtained from solar panels. By doing so, a relatively rapid
reduction of up to 10% of our total GHG emissions could take
place. Additional reductions could be expected as the
transportation system expands.

  That system is Personal Rapid Transit (PRT).

Santa Cruz has authorized the publication of a Request for
Qualifications (RFQ) to determine what vendors are qualified to
develop and install such a PRT system.

The idea of Californis cities taking a serious look at PRT was
presented to the Economic and Technology Advancement Advisory
Committee (ETAAC). As one comment already pointed out, the ETAAC
final report acknowledged the potential of PRT. The GHG Scoping
Plan should continue that concept.

The GHG Scoping Plan needs to:
1. Acknowledge the good potential of PRT powered by soalr
generated electricity to cause an early reduction in GHG
emissions.
2. Recommend resources for cities to initiate small PRT programs
in focussed areas of automobile gridlock where high levels of sov
drivers can readily be attracted to PRT transportation.
3. Recommend accelerated State certification processes for
emerging PRT designs.
4. Recommend seed funding programs for cities to commence
acquisition of PRT systems.
5. Recommend the development of a pro-forma business plan that
cities can use to acquire and operate a PRT system.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-18 09:34:59

No Duplicates.

Comment 87 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Rick
Last Name: Ramacier
Email Address: cseghers@arb.ca.gov
Affiliation: Central Contra Costa County Transit

Subject: Draft Scoping Plan
Comment:

please see attached letter

Attachment: www.arb.ca.gov/lists/sp-transport-ws/95-8_15_08_countyconnection.pdf

Original File Name: 8_15_08_countyconnection.pdf

Date and Time Comment Was Submitted: 2008-08-19 14:09:45

No Duplicates.

Comment 88 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Carolyn
Last Name: Casavan
Email Address: ccasavan@wcenviro.com
Affiliation: West Coast Environmental and Engineering

Subject: Proposed GHG Emissions Reporting for Passenger Vehicles
Comment:

This suggestion promotes the involvement of individuals in reducing greenhouse gas (GHG) emissions in the state.

According to the Draft Plan, transportation accounts for 38% of GHG emissions in the state. A major problem with regard to priority pollutant regulations is that business has been required to shoulder the bulk of the responsibility and reduction. As a result, while business has been reducing emissions, vehicle miles traveled (VMT) and vehicle size have been increasing. One of the best things we can do is to have the residents of the state understand their contribution and responsibility.

This proposal involves reporting vehicle GHG emissions through the Department of Motor Vehicles (DMV) registration process. The way this could be done is that vehicle owners would report their odometer readings annually as part of the registration process. The GHG emissions can be calculated from this information and a fee could be charged to reflect total GHG emissions contribution or GHG emissions in excess of a standard. The data could be put directly into a statewide database.

Following is an example of how this process could work. On registration renewal:
1. The odometer reading would be reported on the renewal form. This could be verified by the DMV once every 3 years and on sale of vehicle. (Eventually this information may be available electronically from the vehicle’s data system.)

2. Calculate GHG emissions based on total miles for the year and mpg rating for the vehicle make and model.

3. Calculate the fee based on a tiered fee rate similar to water and electricity.
    a. Tier 1 – Target mpg * 12,000 miles * base rate factor.
    b. Tier 2 – GHG in excess of Tier 1 * higher rate
    c. Tier 3 – Can add a second incremental tier rate if desired.
4. Consider adding provisions for public transportation vouchers for households that are substantially under.

The program can be revenue neutral or can be revenue neutral with regard to Tier 1 and revenue enhancing for Tier 2 and 3. Excess revenues collected from the program could be invested in public transportation projects.

There are many advantages of this system. Individuals have control over their fee. Someone with a high mpg vehicle and low VMT may be able to avoid any fee increase. Whereas taxing gasoline, taxes everyone. Individuals will see exactly what their emissions are per year and understand what they can do to reduce those emissions. For every household, automobile use makes up the major portion of the per person emissions. Educational programs can be designed to encourage people to achieve a certain GHG emission per person. Low income individuals can control their fees by reducing their VMT or switching to higher mpg vehicles.

The database will provide the state with important information regarding vehicle emissions tied to location. This information can be used to compare VMT/GHG emissions for various land use locations and types. Also, the effects of land use and regulatory changes can be tracked to a certain extent. Most importantly, the system makes individuals responsible for their emissions. A tax on fuel does not raise awareness of personal contribution. Rather it transfers blame to the oil companies and this disconnect in accountability results in unplanned increases in emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-02 12:12:18

No Duplicates.

Comment 89 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Carolyn
Last Name: Casavan
Email Address: ccasavan@wcenviro.com
Affiliation: West Coast Environmental and Engineering

Subject: Public Transportation and Transportation Planning
Comment:

Our current transportation planning process is geared toward reducing congestion and does not take into account GHG emissions reduction. Nearly all of the regional transportation plans in the state will result in increases in emissions over the next 20 years, not reductions. The Los Angeles Metropolitan Transportation Authority, Draft 2008 Long Range Transportation Plan (LRTP, p. 15) indicates that transportation related greenhouse gas emissions in Los Angeles County will increase by 35% between 2004 and 2030. Implementation of the LRTP will reduce these emissions by less than 1%.

The current transportation planning process is primarily focused on reducing traffic congestion. If we want people to reduce their automotive emissions then we need to substantially expand our public transportation system. I know that up until recently, it has been difficult to get people to use public transportation, but it looks like that is changing. As fuel prices increase as a result of world markets and AB 32 implementation, we are going to see more and more people turning to public transportation and it is important that we provide the infrastructure to expand the viability of this alternative. Smart growth will result in emissions reductions only if we have sufficient public transportation to accompany it.

A suggested approach is to supplement the current transportation planning process with a GHG emissions reduction planning process. The transportation authorities could assess total public transportation and other projects that would be needed to reduce regional transportation GHG emissions by 30% from BAU. These projects would then be in line to be funded through AB 32 revenues generated from transportation and fuel related measures.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-02 12:15:23

No Duplicates.

Comment 90 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Will
Last Name: Travis
Email Address: cseghers@arb.ca.gov
Affiliation: bcdc

Subject: Climate Change Draft Scoping Plan for AB 32
Comment:

please see attached letter

Attachment: www.arb.ca.gov/lists/sp-transport-ws/100-8_26_08_sfbcdc.pdf

Original File Name: 8_26_08_sfbcdc.pdf

Date and Time Comment Was Submitted: 2008-09-02 15:16:36

No Duplicates.

Comment 91 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Sawyer
Email Address: jsawyer@srcity.org
Affiliation: Mayor, City of Santa Rosa

Subject: City of Santa Rosa Comments
Comment:

```
Please find attached the City of Santa Rosa's comments.  Thank you.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/101-ab32_comment_letter.pdf

Original File Name: AB32 Comment Letter.pdf

Date and Time Comment Was Submitted: 2008-09-16 09:46:14

No Duplicates.

Comment 92 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: Rajiv
Last Name: Bhatia
Email Address: rajiv.bhatia@sfdph.org
Affiliation:

Subject: highway speed reductions can lower carbon emmissions
Comment:

```
The CARB AB 32 scoping plan should consider and analyze highway
maximum speed reductions as a feasible and immediate potential
climate protection strategy with substantial health co-benefits.
Please see the attached document for the basis of this
recommendation.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/102-carb_cc_scope_comment_highway_speed.pdf

Original File Name: CARB CC Scope Comment Highway Speed.pdf

Date and Time Comment Was Submitted: 2008-10-02 15:38:41

No Duplicates.

Comment 93 for Transportation Comments for the GHG Scoping Plan (sp-transport-ws) - 1st Workshop.

First Name: John
Last Name: Boesel
Email Address: jboesel@calstart.org
Affiliation:

Subject: CALSTART comments on transportation policies
Comment:

```
CALSTART believes that the AB 32 Scoping Plan represents a good
first step toward comprehensive climate policy in California, but
many areas require additional attention. Our comments relate to
(1) targets and assumptions, (2) the interaction of air quality
and GHG programs, (3) the scope of the proposed cap and trade
program, (4) technology innovation, (5) land use, (6) pricing
policies, and (7) methane emissions.
```

Attachment: www.arb.ca.gov/lists/sp-transport-ws/103-calstart_comments_on_draft_ab_32_scoping_plan_10-08.doc

Original File Name: CALSTART comments on draft AB 32 Scoping Plan 10-08.doc

Date and Time Comment Was Submitted: 2008-10-02 19:17:47

No Duplicates.

There are no comments posted to Transportation Comments for the GHG Scoping Plan (sp-transport-ws) that were presented during the Workshop at this time.