

**Comment 1 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Michael

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation:

Subject: SB 375 Driving Reduction Targets for MPOs & Strategies to Reduce Driving  
Comment:

Honorable CARB Chair and Members:

I have attached a Power Point file which is the visual part of my message. My words to further explain the Power Point slides are as follows:

[Power Point Slide #1] I am Mike Bullock, a twice-elected member of the San Diego County Democratic Party Central Committee, a retired satellite systems engineer, and a volunteer for an environmental organization, where I work on local transportation issues. I also submit and present papers for the Energy-Utility-Environment Conferences (EUECs) and the Air and Waste Management Association (AWMA) conferences. I have presented 5 AWMA papers, all on the topic of climate and transportation.

My first 13 slides are on the setting of the updated SB 375 Vehicle-Miles Traveled (VMT) Reduction Targets. I will then present 6 slides on how the needed VMT reduction can be achieved.

[Slide 2]

CEQA requires an EIR for Regional Transportation Plans (RTPs). The EIRs must show whether or not the RTP will result in cars and light-duty trucks achieving climate-stabilizing targets. CEQA is about the physical world; not just laws. SB 32 may or may not be climate stabilizing. Also, the EIR must not ignore feasible mitigations. CARB should help MTPs obey CEQA. In 2011, SANDAG violated CEQA law, in part because they were led to believe that all they had to do was achieve your 2035 target, even though that target did not even come close to supporting Executive Order S-3-05, let alone climate stabilization.

[Slide 3] Cars and Light-duty trucks are the biggest emitters of GHG

[Slide 4] Climate Literacy, defined

[Slide 5] How Bad Could It Get?

[Slide 6] Our climate crisis (and showing that Scott Pruitt is obviously incorrect)

[Slide 7] Fixing the Problem

[Slide 8] What the climate scientist say

[Slide 9] The climate-stabilizing target

[Slide 10] From the 2016 California Democratic Party Platform:

- Demand Regional Transportation Plan driving-reduction targets,

shown by science to support climate stabilization

To do that, we would need to know the fleet efficiency, for the target year. The California Democratic Party understood this. Therefore:

[Slide 11] Demand a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed

1. fleet efficiency and
2. per-capita driving

Unfortunately, neither you (CARB) nor any MPO is doing such a plan, to my knowledge. Fortunately, however, there is a plan that has been peer-reviewed by both the Energy-Utility and Environment Conference officials and the Air and Waste Management Association. I would be happy to forward that report to you. Please let me know if you are interested.

[Slide 12] Here are two cases that were considered, using the methods developed in the AWMA report. The columns of numbers are the percent of the fleet sold in California that is Battery-Electric. The case on the left is from the comments made by you, Madam CARB Chair. The case on the right is a more realistic case, because it requires a smaller reduction in driving. The "CARB Case" would require a 58 percent reduction in per-capita driving, with respect to 2005; the more-realistic case requires a 32% reduction, which is achievable.

[Slide 13] Finally, from the CDP Platform:

- Work for equitable and environmentally-sound road and parking operations
- Work for shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking

The next 6 slides are about how the needed VMT reductions could be achieved. For more detail, please request the above-mentioned AWMA report.

[Slide 14] How to Reduce Vehicle-Miles Traveled

This could be especially helpful if there is less money to spend and/or estimated costs are rising.

[Slide 15] Stop adding new freeway lanes and by that I mean all types of lanes, even managed lanes. More lanes will not reduce congestion. Academics sometimes call the effect Induced Traffic Demand.

[Slide 16] More lanes won't relieve congestion but they will result in more

- Vehicle-miles-travelled (VMT)
- GHG emissions
- Criteria pollutants that harm health, especially in low-income neighborhoods and
- More frustrated drivers

More lanes use money, some of which could be used for

- Road maintenance
- Improvements in mass transit
- Improvements in conditions for active-transportation and
- Projects to improve how we pay for the use of roads, and/or car parking

The last three items would reduce VMT. Expanding freeways is a lose, lose, lose proposition.

[Slide 17] Projects to reduce driving include

- More mass transit
- Improvements in conditions for active-transportation
- Systems to improve how we pay for the use of roads, and/or car parking
- Transit Oriented Development

[Slide 18] Improve How We Pay for the Use of Roads

There is an on-going pilot project of a Road Use Charge, or "RUC". This is being conducted by the RUC Technical Advisory Committee or "RUC TAC", of the California Transportation Committee, under SB 1077. When complete, it will be time for the coming revolution: the System Design and Implementation of a RUC which should, for example, fund all road maintenance. Whether the RUC is good or bad is up to us. A sales tax or bond measure for maintenance is the wrong approach. CARB needs to provide leadership in its scoping plans and its SB 375 target-setting process.

[Slide 19] Improve how we pay for the use of parking

This is sometimes described in San Diego County environmental organization response letters. There's the link showing details, for this pricing-and-payout system. First, demonstration projects are needed.

- Such a proposal was called feasible mitigation in Appellate Court, here in San Diego. San Diego County, like most municipal governments, strives mightily to avoid meaningful change. CARB needs to provide leadership.
- From the 2016 California Democratic Party Platform: "work for shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking"

I have reports that spell out exactly how a demonstration project could be set up to develop and improve the needed hardware and software. A demonstration project could include a feature that would allow employees to opt out of the program, if they wish. This feature was included in the mitigation measure identified in the SDC Climate Action Plan lawsuit. The Appellate Court Justice that asked about this measure in Oral Arguments was impressed and called the measure an example of a feasible mitigation that was ignored.

Please do not ignore this feasible mitigation measure. Leadership is needed.

Thank you for your environmental leadership.

Sincerely,

Mike Bullock

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-sb375targetupdate-ws-BmVdOlUmVWQEXQN3.ppt>

Original File Name: CARB\_TargetsThenVMT\_Reduction.ppt

Date and Time Comment Was Submitted: 2017-03-19 17:20:57

No Duplicates.



**Comment 2 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

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

Subject: Regional Targets Update Comments  
Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-sb375targetupdate-ws-AjBUYldnUTUGX1Mh.pdf>

Original File Name: 2017 regional targets comments.pdf

Date and Time Comment Was Submitted: 2017-03-22 08:26:18

No Duplicates.

**Comment 3 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Michael

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation:

Subject: Follow Up Showing How SB 375 Targets Must Help Achieve Climate-Stabilizing Targets  
Comment:

Honorable CARB Chair and Members:

It has been suggested to me that I augment my previous comments with 1.) my Air and Waste Management Association (AWMA) report showing a plan whereby cars and light-duty trucks (the SB 375 emitters) will achieve climate-stabilizing targets AND 2.) by being more explicit in explaining your CEQA responsibilities.

As I mentioned before, from the 2016 California Democratic Party (CDP) Platform:

- Demand Regional Transportation Plan driving-reduction targets, shown by science to support climate stabilization

To do that, we would need to know the fleet efficiency, for the target year. The California Democratic Party understood this. Therefore, also in the their 2016 Platform:

- Demand a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed

1. fleet efficiency and
2. per-capita driving

The attached file is such a state plan.

Please call me at 760-754-8025 if you have question.

Under CEQA, you have a responsibility to have a plan, such as the one I have attached. Furthermore, you should assign targets to the MPOs that support your plan.

No plan to succeed is actually a plan to fail. Failing will, considering this under CEQA law (cumulative effects), result in the loss of most life forms on our planet, including our own species. The assigning of targets is a discretionary project under CEQA and so you must follow CEQA law in assigning SB 375 targets. By the way, for the most part, our extinction will be brought about by a loss of habitat, meaning that we will starve to death. Loss of most life forms on the planet is a very severe environmental impact. Some would say it is unacceptable.

Thank you for your leadership.

Regards,

Mike Bullock

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-sb375targetupdate-ws-BWkHZQB3UFxWIIA1.docx>

Original File Name: LDV\_RequirementsToAchieveNeededTargets3.docx

Date and Time Comment Was Submitted: 2017-03-22 15:54:14

No Duplicates.

**Comment 4 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Laura

Last Name: Rosenberger Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation:

Subject: Greenhouse gas and other dangerous emissions from fuels made from oil

Comment:

Oil extraction involves diesel pumps and diesel vehicles.

The heavy oil extracted near Bakersfield emits more greenhouse gases than the oil in other locations in California and use more toxic volatile diluents that bind to fine particulate matter.

Fracking often emits benzenes, toluene, methylene chloride, formaldehyde, trimethylsilanol, isoprene, and sometimes several more chemicals listed under Prop 65 as carcinogenic or linked to reproductive harm. (See article:Californians At Risk )

The Midway Sunset Oilfield emits 58,720 metric tons of CO2 eq. per day. The Kern River(oil)Field emits particulate pollution and 46,380 metric tons of CO2 eq/day.

Also, these are disadvantaged communities. There was an orange haze over Kern County. I felt sick and dizzy there and also several miles SW of Fresno when the wind was blowing from the South West.

Diesel exhaust particulates (DEPs) "have a highly adsorptive carbon core that act as a vector for the delivery, deep into the lung, of redox active metals, polycyclic aromatic hydrocarbons and quinones. In addition to traffic density per se, it is not surprising therefore that the greatest health impacts appear to be associated with proximity to roads carrying a high proportion of diesel powered heavy and light good vehicles (Janssen et al. 2003; Gowers et al. 2012). In 2012, the International Agency for Research on Cancer (IARC) classified particulates in diesel fumes as carcinogenic to humans based on sufficient evidence that it is linked to an increased risk of lung cancer, as well as limited evidence linking it to an increased risk of bladder cancer (IARC 2012)." (From: Environ Geochem Health. 2015; 37(4): 631-649.

Published online 2015 Jun 4. Air pollution and public health: emerging hazards and improved understanding of risk

Frank J. Kellycorresponding author and Julia C. Fussell)

We need less emissions and better efficiency in diesel and gasoline powered vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-22 16:48:11

No Duplicates.

**Comment 5 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Nikita

Last Name: Daryanani

Email Address: [ndaryanani@leadershipcounsel.org](mailto:ndaryanani@leadershipcounsel.org)

Affiliation:

Subject: SB 375 Regional Greenhouse Gas (GHG) Emission Reduction Targets for California's MPOs

Comment:

Dear ARB Staff:

We'd like to thank you for the opportunity to comment on ARB's target updating process under SB 375. As organizations working directly with disadvantaged communities throughout the San Joaquin and East Coachella Valleys, we feel it is critical that the state create sustainable solutions for communities burdened the most by inequitable land use policies and poor transportation planning. We believe the target setting process presents an opportunity for disadvantaged communities to experience co-benefits from greenhouse gas reductions and equitable land use and transportation planning.

Transportation contributes to 37% of our state's greenhouse gas inventory, and the San Joaquin Valley already experiences some of the poorest air quality in the state and in the country. We believe that ambitious targets encourage Metropolitan Planning Organizations (MPOs) to reevaluate land use and transportation planning to reduce emissions from transportation. The current targets allow for the continuation of the status quo, which is in stark contrast with our state's climate goals. We believe that as the responsible agency for the implementation of SB 32, the California Air Resources Board must urge MPOs to create stronger, more innovative Sustainable Communities Strategies (SCSs), and can do this by setting more aggressive regional targets.

The Scoping Plan and the target setting process presents an opportunity for investing in and planning for rural, disadvantaged communities and maximizing co-benefits to these communities. These co-benefits include improved air quality and public health, increased access to reliable, affordable public transit, and increased connectivity within and to other communities. Many of the communities throughout the San Joaquin Valley that we work with lack active transportation infrastructure and public transit options to help residents access the services they need on a daily basis. Regions must prioritize projects that reduce Vehicle Miles Traveled (VMTs) and provide real options for residents in order for state climate goals to be reached. Additionally, MPOs must consider models that differ from the traditional modes of public transit to think more creatively about programs that would fit the distinct needs of rural communities, such as carshares and vanpools.

ARB must play an active role in ensuring that projects promoting infill development and investment in existing communities are prioritized over sprawl development so that regional land-use planning is aligned with reduction targets. Madera County, for example, is moving forward with a large residential project in the northwest area of the county with little to no affordable housing for low-income residents. This development will arguably increase VMTs and is therefore in direct contradiction of the intention of SB 375 and the state's climate goals as a whole. Higher, more meaningful targets would provide an incentive for MPOs to make

decisions that are coordinated with the state's 2030 greenhouse gas reduction goals and would also encourage MPOs to seek funding for more equitable projects.

We urge ARB to be more critical of the MPOs reduction target recommendations and set higher targets to incentivize MPOs to include stronger programs and policies in their Sustainable Community Strategies. Ambitious programs will ensure that disadvantaged communities can experience the benefits that SB 375 intends to provide, and that communities on the frontline of climate change receive investments to build resiliency.

Sincerely,

Nikita Daryanani  
Leadership Counsel for Justice and Accountability

Dolores Weller  
Central Valley Air Quality Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-sb375targetupdate-ws-ATIFLVNgVDQGLldm.pdf>

Original File Name: 3.23.17SB375commentletter.pdf

Date and Time Comment Was Submitted: 2017-04-05 09:50:17

No Duplicates.

**Comment 6 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

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

**Comment 7 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Chanell

Last Name: Fletcher

Email Address: [chanell@climateplanca.org](mailto:chanell@climateplanca.org)

Affiliation:

Subject: NGOs Comment Letter on MPOs' SB 375 Target Recommendation

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-sb375targetupdate-ws-VzEFagdoVGYBawJj.pdf>

Original File Name: FINALARBTargetsSubmissionCommentLetter.pdf

Date and Time Comment Was Submitted: 2017-05-08 09:59:08

No Duplicates.

**Comment 8 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Brian

Last Name: Thomas

Email Address: brianthomas241@gmail.com

Affiliation:

Subject: Emissions for cars

Comment:

Why are intakes and exhaust components such as long tube headers (IE: ones that move the catalytic converter) bad? Cold Air Intakes allow cars to bring in more air. I don't see how any intake can cause pollution, but yet most all intakes cannot be used in CA. Exhaust is another concern of mine. I understand they can cause a noise problem or can pollute the air if the exhaust is missing vital components such as a catalytic converter. I had an aftermarket catalytic converter on my old truck because it was cheaper than the OEM component. I took it through smog and it passed the functional check but failed the visual inspection. I understand the law is the law, but can I get clarification on why California has a visual inspection?

I know all the company has to do is submit their product for your review and you will issue a carb number...

What I'm after is the reason why California requires a visual inspection of the intake/exhaust components.

Why will my car not pass smog if I decided to move my stock catalytic converter or to get long tube headers and use a high flow catalytic converter that will pass the functional check.

Thank you for your time,  
Brian Thomas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-05-09 19:25:14

No Duplicates.

**Comment 9 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Matt  
Last Name: Baker  
Email Address: ecos.habitat@gmail.com  
Affiliation:

Subject: ECOS Notes on SACOG Stress Test

Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-sb375targetupdate-ws-UiEFYIIwBztXNgh7.pdf>

Original File Name: SACOGstresstestBrief.Baker.4.27.17.pdf

Date and Time Comment Was Submitted: 2017-05-15 13:04:56

No Duplicates.

**Comment 10 for : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) - 1st Workshop.**

First Name: Chanell

Last Name: Fletcher

Email Address: [chanell@climateplanca.org](mailto:chanell@climateplanca.org)

Affiliation: ClimatePlan

Subject: ClimatePlan comments on ARB roundtable

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-sb375targetupdate-ws-B2RXPQZuBzlVMgRw.pdf>

Original File Name: ClimatePlan\_Comments\_on\_ARBRoundtable\_5\_26.pdf

Date and Time Comment Was Submitted: 2017-05-30 11:01:34

No Duplicates.

**There are no comments posted to : Comment docket for updating the Senate Bill 375 regional passenger vehicle greenhouse gas emission reduction targets for the State's MPOs (sb375targetupdate-ws) that were presented during the Workshop at this time.**