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Comment on Draft for Public Comment

Cap-and-Trade Auction Proceeds

Funding Guidelines for Agencies that

Administer California Climate Investments

Released June 16, 2015

Air Resources Board

<http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ggrf-guidelines-ws&comm> period=1

Dear Air Resources Board:

I am opposed to the use of Cap-and-Trade Auction proceeds being used for the California High Speed Rail Project. ARB Investment Guidelines need to be much more strict regarding data and projected data not only on GHG emissions reductions, but on the track record of actual emissions by California High Speed Rail and reasonable projections by a third party.

To begin, California High Speed Rail only projects how many tons of GHG’s it will reduce over given periods of time. These projections are not based on any real or accessible data, and do not contain any factoring in of construction emissions of GHG’s. When one considers the vast amount of GHG’s that will be emitted merely from construction with concrete, trucks, and bulldozing and other equipment, one begins to understand how much CO2, SO2, CO, and diesel particulates will be released over the many years of construction. But where is the data? Neither CHSRA nor CARB, to my knowledge, has released any data on this matter. The Legislative Analysts office has warned that high speed rail will increase GHG emissions (January, 13, 2014). Chester and Horvath, Access, spring 2015 have found that “infrastructure construction will emit roughly 490 million metric tons of greenhouse gasses, which are approximately 15 percent of California’s current annual emissions.” They also state, “the life-cycle inventory for high speed rail shows that accounting for infrastructure construction and electricity production adds 40 percent to the energy consumed by the train’s operations alone.” There is no way that high speed rail can even begin to reduce GHG’s by 2020, and most likely will still be a gross polluter even up to 2030. The proceeds could well be used better in more effective programs.

Secondly, Governor Brown has even himself referred to the auction proceeds as a “backstop,” designed to be used for acquisition for right of way and construction related expenditures. Cap-And–Trade funds are set aside specifically for the reduction of GHG’s and not for the funding of projects with dubious projections of emissions reductions, and poor funding projections for their own construction and operating costs.

Thirdly, even if by 2050 high speed rail could make a dent in GHG emissions, most likely it would be by only 0.5% (W. Cox and A. Moore, A Dynamic Impact and Cost Analysis, March, 2014). Using Cap-and-Trade funds for such a minimal advantage is an extremely expensive strategy when so many more cost effective plans are or would be available. CHRSA has not demonstrated that it is a reliable partner in either its business plan (LAO, April, 2012) or in its route design. Choosing the trans Tehachipi mountain route adds time and miles that will increase cost and GHG emissions and decrease ridership or operate in a relatively low ridership route.

Finally, high speed rail in California as currently designed will have no reliable ability to reduce GHG’s unless its ridership is at very high (90% or higher) levels. Running trains from San Francisco or the central valley to Los Angeles. Even at mid (11 to 89%) levels of passengers, it would take 70 years to overcome GHG emissions (M.Chester, UC Berkley, and A. Horvath, Arizona State Univ., Access Magazine, Spring, 2015). At low levels, GHG emissions would never by overcome.

For these reasons, I urge the ARB to produce stricter guidelines and more strictly assess CHSRA proposals for auction Proceeds.