

Comments to the California Air Resources Board On the Final Staff Draft AB32 Scoping Report

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1. My expertise is in urban modeling.

I developed the first urban models in the Sacramento region.
I now have two types of urban models running for all California counties.
My GHG calculator is being used by 8 counties doing Blueprint plans.
I have been a planning commissioner in Davis and in Truckee.

2. A valid target for local govts. would be 8-10 MMT/day, achieved over a 10-yr. period, based on my research on the Sacramento region and on my review of urban modeling studies done in the U.S. and other countries.
This agrees with the ARB's Rodier study, except I only look at data from regional scenarios with strong policies. Transit, land use, and pricing policies, together.

3. The Scoping Report needs to be more direct in recommending policies needed for local climate plans and Sustainable Communities Plans.

- a) Higher-density infill, transit-oriented development, and no sprawl.
- b) Most transportation capital funding should go to transit, walk, and bike.
- c) Parking cashout for workplace parking. My modeling studies show the importance of this policy. This doesn't add costs to drivers, it unbundles costs.
- d) Indirect Source Review should be recommended to local air districts. Such fees are necessary to affect developers, by counteracting NIMBYs.
See the Attorney General's settlement with Stockton for such policies.

4. The Report should state that if MPOs or counties add highway capacity, it is likely to make it more difficult to attain the SB32 targets.

This is due to the added travel by autos induced by the road widenings. A National Academy of Sciences panel found that highway widenings in urban areas induce additional travel (TRB Spec. Rept. 245, 1995).
The added GHG emissions from on-road vehicles could require lower caps on industrial and power plant emissions and create higher total costs.

Stockton Settlement:

1. Residential and nonresidential new-building energy standards (BIG and LEED).
2. Strong transit plan.
3. Fees on new development to help pay for transit.
4. Large land use projects must be dense.
5. Infill targets (% of new development).
6. Incentives for new infill projects.
7. Projects to be annexed only if served by transit and have jobs/housing balance.