C-08-120

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Making San Francisco Bay Better

August 26, 2008

The Honorable, Mary D. Nichols, Chair
California Air Resources Board
1001 "I" Street
PO Box 2815
Sacramento, CA 95812

SUBJECT: Climate Change Draft Scoping Plan for AB 32

Dear Chair Nichols:

On behalf of the San Francisco Bay Conservation and Development Commission (BCDC), I would like to commend the California Air Resources Board (ARB) for developing a draft plan to meet the goals identified in the Global Warming Solutions Act and for identifying and implementing early action items, such as Green Ports, that will help move California toward near term reductions in emissions while we plan for the longer term efforts. The draft plan, entitled *Climate Change Draft Scoping Plan, June 2008 Discussion Draft* (DSP), does an effective job of identifying the many sectors in California that will need to reduce emissions in order to meet the goals identified in AB 32 and the strategies that will be required to achieve these goals. Although the DSP includes some strong recommendations and innovative directions, we believe the plan could go farther in recommending alternative strategies for some sectors. We also believe the plan overestimates reductions from certain sectors and seems to rely too heavily on technology and traditional efficiency measures for reductions in other sectors. While traditional efficiency measures and new technologies should be central components of California's strategy, historically they have failed to keep pace with increasing demand and population growth.

Our suggestions for improving the DSP reflect BCDC's work with other regional agencies in the Bay Area to address global climate change. As described in the DSP, Californians have already begun to develop strategies for addressing global climate change. In the Bay Area, BCDC and the other regional agencies are working collaboratively to develop effective strategies that will reduce emissions in the region while also addressing the region's other critical issues, such as housing affordability, congestion on the region's roadways and the health of the region's residents. Because the transportation sector is the Bay Area's largest single source of emissions, the focus in the region has been on reducing emissions from transportation. It is in this area in particular where we believe the DSP falls short by setting too low a target and not identifying key strategies to achieve the gains that could be made by local government and regional agency actions.

Local Government Actions and Regional Targets. The DSP identifies transportation as the largest source of greenhouse gas emissions in California and states that it is expected to grow by 25 percent if no action is taken. The next largest sector is identified as electricity and the commercial/residential energy sector, contributing over 30 percent of emissions. Although both of these sectors are heavily influenced by local government actions and land use decisions, the target set for reductions from land use decisions is only 2 MMT in 2020. While it is true that actions taken in the land use and transportation sectors will take some time to show gains and may be more of a factor in the goals for 2050, it is critical to start now with aggressive targets in order to realize those gains in 2050. By setting too low a target for this sector and relying too heavily on improvements in fuel efficiency and low carbon fuels, the plan largely overlooks vehicle miles traveled (VMT) as key indicator of emissions from the transportation sector. In the past, fuel economy and cleaner fuels have not been able to keep pace with increases in VMT, which have outstripped population growth by over 150 percent, and increased over the improvements in fuel efficiency and cleaner fuels.

Analysis done recently by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) for MTC's Regional Transportation Plan, *Transportation 2035: Change in Motion* shows that land use decisions that aggressively focus a significant percentage of new growth in already urbanized areas near transit, accompanied by pricing and roadway efficiency measures, can make a significant difference in addressing many of the challenges facing the region and the state. Focused growth reduces congestion, provides more housing options, reduces per capita water usage, improves the health of the region's residents and reduces greenhouse gas emissions. In presenting its analysis, MTC stated "In order to move the needle at all relative to the region's transportation, climate change and other environmental quality performance targets, a highly agressive land use scenario and a complimentary aggressive pricing strategy had to be developed."

The findings described above are consistent with a number of other studies conducted on the relationship of VMT, land use and emissions. These studies have found a strong relationship between the distance that a person lives from a transit station and that person's VMT. Some of these findings include: those that live within a quarter of a mile from transit station drive from 20 to 40 percent less than those living further away; and a person switching from driving alone to taking transit can reduce their household's greenhouse gas emissions by 30 percent, which has a significantly greater impact than changing light bulbs and adjusting a home's thermostat. These statistics point to the need to reduce VMT and the most effective way to do this is through land use planning that encourages neighborhoods and mixed-use communities built at densities high enough to support a variety of modes and commensurate public transit, pedestrian and bicycle improvements. This type of land use planning and transportation changes accompanied by pricing strategies would provide a much greater reduction in emissions than is currently anticipated from this sector by the plan and would result in structural changes that could help California meet its 2050 emissions targets. More importantly, these strategies also address many of the other challenges that the state currently faces including water supply, public health, aging infrastructure and the inability to maintain existing infrastructure, the loss of open space and agricultural lands and roadway congestion.

Goods Movement. The DSP identifies several strategies for reducing emissions from goods movement, but could include several more that could make a significant contribution to reducing emissions and improving the health and quality of life for those who live near ports. The diversion of goods movement from trucks to rail should be included, as well as providing assistance to truck companies to retrofit existing trucks or purchase new trucks that run on cleaner fuels and reduce emissions. Reducing truck emissions near ports is critical in maintaining efficient goods movement, because the health effects from this pollution source threaten opportunities to expand cargo throughput, when our projections show that we need to expand throughput capability at our ports. This strategy provides an excellent opportunity to address environmental justice concerns by reducing emissions in areas where residents have significant respiratory problems, compared with other areas. Additionally, a strategy that would encourage ships to use cleaner fuels within California's waters and when at port would also help to reduce the emissions associated with the goods movement sector. We trust that the shipping industry, which has shown tremendous capacity to innovate over the years will respond creatively with innovations that can achieve these ambitious goals.

Thank you again for the opportunity to comment on the plan. I am available to discuss these comments with you at (415) 352-3653 or by email at travis@bcdc.ca.gov.

Sincerely,

WILL TRAVIS
Executive Director

WT/gg