

## **ClimatePlan Talking Points on AB 32 Final Scoping Plan November 6, 2008**

On October 15th, the California Air Resources Board (CARB) unveiled its final recommendations for reducing greenhouse gas emissions under AB32 (the Global Warming Solutions Act). While ClimatePlan recognizes the state's progress on advancing smart growth – the new plan more than doubles the emission reduction target for land use from the previous draft – a more ambitious goal is needed, and a better suite of tools to reach that goal must be encouraged.

### **The New Plan is a Substantial Improvement over the June Draft**

- We applaud the new Plan's greater emphasis on the role of land use and local governments.
- The new Plan more than doubles the goal for the land use sector to 5 million metric tons (MMT) by the year 2020, compared to just 2 MMT in the June draft.
- The Plan also calls on all local governments to reduce their emissions by 15% over current levels by 2020.
- The Plan coordinates well with SB 375, and defers to 375 in establishing regional targets.

### **CARB Should Redouble the Goal for Emission Reduction from Smart Growth**

- CARB should set a goal of 11-14 MMT and send a clear signal that new communities should be walkable, affordable, and have great transportation choices.
- A September 2008 scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson, authors of *Growing Cooler*, the definitive scholarly text on urban development and climate change, finds that a target of 11-14 MMT a year is achievable with policies California is already contemplating (the Ewing Report is available at [www.climateplan.org](http://www.climateplan.org)).
- A target of 11-14 MMT translates to a very modest reduction in driving in 2020 – less than *four miles per day* per licensed driver.
- Regions around California have already adopted plans that will reduce GHGs by 7.1 MMT by 2020, according to Stanford University's Jim Sweeney.

### **CARB must set a higher 2020 target for land use in order to put California on track for the 2050 target.**

- We simply can't afford another 10 years of business as usual development. If CARB sets a low target for land use, the result may be 10 more years of sprawl. This will make it impossible to reach our 2050 target.
- For California to achieve its 2050 target, we must achieve VMT reductions of approximately 10% by 2020 and 20% by 2030. The current 5 MMT target equates to a 4% VMT reduction by 2020 – less than half of what is needed to keep California on track.

### **The methodology CARB used to generate their current 5MMT estimate is outdated and flawed.**

- For a document as important as the AB 32 Scoping Plan, CARB should draw on the broadest possible range of studies and methodologies available to generate their estimate of reductions from the land use sector. Instead, they rely on a single study (The UC Berkeley report) to generate the 5MMT estimate.
- The regional model simulations in the UC Berkeley report are widely acknowledged to understate the benefits of dense mixed use development.
- Even the author of the UC Berkeley report criticizes the models in her study: "the results confirm that even improved calibrated travel models are likely to underestimate VKT [vehicle kilometers traveled] reductions from land use, transit, and pricing policies. These models simply are not suited for the policy analysis demands in the era of global climate change."
- Rather than basing their estimate on a *single* study, CARB should examine a more recent report from the authors of *Growing Cooler*, which suggests that reductions of 11-14MMTs are

possible by 2020 (The Ewing Report).

- Unlike the UC Berkeley report, the Ewing Report is based on actual historical data for a 20 year period exclusively from California. It is far more realistic in its projections than a series of regional modeling studies from different states and nations with widely differing circumstances (as included in the UC Berkeley report).

### **Additional Policy Tools are Essential: Adopt the Indirect Source Rule (ISR)**

- CARB should adopt a statewide Indirect Source Rule for carbon dioxide.
- The indirect source rule, already in effect in the San Joaquin Valley for air pollution, is a proven policy tool that helps developers and planners calculate and mitigate the impacts of projects.
- ISR creates a local revenue fund to help local governments implement Climate Action Plans.
- Rural non-MPO counties are excluded from SB 375, so ISR would be the only tool that rural counties can use to address the GHG impacts of land use.

### **Prioritize Public Transit Funding**

- The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.
- When transit is convenient and reliable, people choose to use it. When Bay Area residents both live and work within ½ mile of transit, 42% of them ride it to work.

### **GHG Reductions from Land Conservation Should Be Quantified and Prioritized**

- In addition to reducing VMT, smart growth also reduces greenhouse gas emissions by preserving landscapes that sequester carbon, such as forests, agricultural lands, and oak woodlands. CARB should establish guidelines for quantifying the emission reduction benefits of preserving these landscapes, and for mitigating the GHG emissions and loss of sequestration resulting from conversion.
- There are a number of possible mechanisms for implementing this strategy, including SB 375, CEQA, and Indirect Source Review.
- Many of California's carbon-capturing landscapes are outside of MPOs, and therefore are not covered by SB 375. CARB should ensure that additional policy measures are adopted that apply to these rural counties.
- SB 375 and other land use measures should be coordinated with the Sustainable Forests measures to avoid duplicative efforts and maximize benefits in both sectors.

### **Public Health and Environmental Justice Issues Must Be Addressed**

- The Final Scoping Plan has failed to adequately respond to concerns raised by the EJAC and public health community.
- CARB should adopt the EJAC's recommendations to increase the 2020 target for land use, invest in public transit in low-income communities, and create incentives for local governments to reduce their emissions.
- The public health analysis should include specific data about public health impacts associated with community design, including impacts on obesity, chronic disease and public safety.
- CARB should ensure that the public health community has an ongoing, formal role in shaping AB 32 policy.

### **Smart Growth is Good for California's Economy**

- Smart growth is a net economic benefit for California, according to a recent analysis by Stanford University's Jim Sweeney.
- Californians want and need to live closer to jobs and public transportation choices – because smart growth will free them from high gas prices. The cost of driving a mile in the U.S. nearly doubled between 2002 and 2007.
- The Sacramento Region (SACOG) estimates their smart growth blueprint will save \$16 billion in infrastructure costs by 2030.