

Take a Unified Approach to Global Climate Change

What's Best for Michigan

Ensure that any program or policy enacted to implement a climate change strategy include all sectors of the economy, not only transportation.

Keep funding from climate change mitigation programs separate from air quality programs. Air quality programs focus on particulate matter and pollutants not known to contribute to climate change. Climate change mitigation should be achieved through new legislation rather than with the Clean Air Act.

The transportation component of the nation's climate change strategy should emphasize alternative modes of transportation as a tool for reducing green house gas (GHG) emissions. This includes expanding the use of freight and passenger rail, transit, and addressing bottlenecks.

Why

Transportation will be an important component of any broad based climate change strategy. To ensure that all sectors of the economy responsible for GHG emissions contribute equitably to the solution, a piecemeal approach to implementing mitigation measures should be avoided. Comprehensive federal legislation to address climate change will help ensure that all sectors that contribute GHG emissions will have a role in reducing them.

Because global climate change is caused not just by carbon emissions but also by other specific gases (unrelated to transportation), carbon emissions should not be singled out for regulation through the Clean Air Act. Further, air pollution analysis required by the Clean Air Act traditionally evaluates toxins and precursors to hazardous chemical formation. Carbon is a stable particulate that does not behave according to that photochemical emissions modeling scenario. In order to separately measure carbon emissions, or other greenhouse gases, as part of the Clean Air Act, the EPA would need to develop a federally approved tool for use in transportation project level and system level conformity analysis that would evaluate carbon emissions "separately" from other particulates that are already regulated.

If climate change legislation is enacted it should be a flexible market based approach, such as cap and trade or carbon tax. This follows the recommendations of both the Michigan Climate Action Council and the Midwestern Governors Greenhouse Gas Award.