

December 12, 2007

Steve Church
California Air Resources Board
1001 I Street, PO Box 2815
Sacramento, CA 95812

Subject: Support for Draft Report Recommendations

Dear Mr. Church:

I am pleased to have the opportunity to review the draft report titled "Economic and Technology Advancement for California Climate Solutions." The Economic and Technology Advancement Advisory Committee (ETAAC) has a unique opportunity to recommend policies and technologies that will overcome barriers to achieving California's climate protection objectives.

Transportation accounts for over 40% of all anthropogenic greenhouse gas (GHG) produced in California, and of that, 70% is from gasoline. We applaud the ETAAC's recognition that achieving California's climate change goals will require reductions in the demand for travel that generates GHGs. We urge that the final report include these demand reduction recommendations, especially those relating to congestion pricing and improved CEQA transportation impact analysis.

We support Transportation Sector Recommendation B, Pricing through Congestion Charges. As the report states, congestion pricing has the potential to reduce congestion, vehicle miles traveled, and GHG emissions. If revenues collected under a charging program are used to improve transit, vehicle emissions can be further reduced. The Authority is currently seeking to implement a congestion pricing demonstration on Doyle Drive, and we are leading the San Francisco Mobility, Access and Pricing Study. We support the report recommendation that the State Legislature provide local governments with the authority to implement congestion pricing projects such as those we are studying.

We also support Transportation Sector Recommendation F, Improved Transportation Impact Analysis Planning. The tools used by public agencies to evaluate the environmental impacts of projects under CEQA must be consistent with and supportive of California's climate change goals. For many local jurisdictions, intersection Level-of-Service (LOS), an auto delay-based measure, may not be the best indicator of transportation impacts. The Authority is leading a study to develop an alternative to LOS for local use, basing the transportation impact of a project on the number of new auto trips that project would generate. Agencies promoting smart growth and transit first policies, as well as reductions in VMT and GHGs, should be able to choose transportation impact measures other than LOS which help implement those policies. We support the report recommendation that the State Resources Agency support these local efforts by amending the CEQA guidelines to recognize transportation impact measures other than LOS.

We would like to support the inclusion of these two recommendations in the ETAAC's report. ETAAC recognition of these approaches – congestion pricing and alternatives



Moving the City.

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to LOS for CEQA impact analysis – would lend support to San Francisco’s efforts to implement these concepts in order to manage the transportation system, implement the City’s Transit First Policy, and achieve climate change goals.

Sincerely,



Tilly Chang
Deputy Director for Planning

cc: Com. McGoldrick
Ed Pike – ICCT
JLM, MEL, EB, AC, RH, CR – Chron, File: MAPS, ATG