

December 11, 2008

Edie Chang, Chief
Planning and Management Branch, Office of Climate Change
California Air Resources Board
1001 "T" Street
Sacramento, CA 95812

Subject: AB 32 Proposed Scoping Plan, dated October 2008

Dear Ms. Chang:

We are pleased to provide our comments on the proposed scoping plan for Assembly Bill (AB) 32. San Francisco is committed to improving environmental quality through greenhouse gas reductions as called for by state law and our own local Climate Action Plan, particularly in the transportation sector, which accounts for 47% of overall greenhouse gas emissions. Our comments focus on Section 6 from the Recommended Actions chapter, "Regional Transportation-related Greenhouse Gas Targets." We hope these comments can help the scope better achieve the aim of the bill.

We recognize that many specifics regarding the Recommended Actions Chapter (Section 6) of AB 32, "Regional Transportation-related Greenhouse Gas Targets," will be detailed through work related to Senate Bill (SB) 375, including the designation of sustainable community strategies in regional transportation plans. Nevertheless, we believe the draft scoping plan can be improved to guide the process for the implementation of SB 375 and thereby better help achieve the new target goal of reducing carbon emissions by five million metric tons by 2020.

1. The scoping plan should include stronger incentives and disincentives for local actions affecting greenhouse gas emissions. In Section #6, there is minimal discussion of how local actions are to be coordinated with regional planning efforts to achieve emissions targets through SB 375. We recommend that language be added to provide guidance to state and regional agencies, particularly funding agencies, on how local governments could be rewarded or penalized for local actions as they relate to achieving regional greenhouse gas targets.
2. The scoping plan should clearly emphasize the need to increase and improve transit service. Section 6 includes only one explicit mention of the need to enhance public transit as a way to lower emissions. Instead, the scoping plan should emphasize the importance of increasing the quality and attractiveness of transit, including the need to stabilize and increase funding sources for transit and alternative modes. The State and Metropolitan Planning Organizations have an important opportunity to expand and improve transit services through the direction of transportation funding, both via capital investment and through operating programs such as the State Transit Assistance Program. These actions would directly implement AB 32's intention to spur better planning on both sides of the transportation/land use equation by improving alternatives to driving and by using transit investment to guide land use development over time.



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3. The scoping plan should call for more specific support of road pricing strategies and projects. Road pricing – in its various forms – is emerging as the single most powerful near term action we can take to reduce emissions and affect location decisions. The plan's discussion of pricing is limited and should be strengthened; it should encourage localities and regions to be proactive about using innovative solutions like pricing to manage demand. Currently, the plan only points out that that regional and local agencies do not have the authority to pursue pricing strategies on their own, implying that some support for legislative authority for these jurisdictions may be warranted. The plan should explicitly call for stronger state support for pricing initiatives. For example the state could create a streamlined process (potentially administrative) for local and regional agencies that undertake technical studies and appropriate public review to obtain the necessary authority to toll.
4. The scoping plan should call for a migration away from traditional aggregate trip-based travel modeling toward more newer, more appropriate technical approaches. For example, tour-based models and integrated land use models are more sensitive to pricing, time of day, and non-work travel shifts, thereby enabling better prediction of the benefits and impacts of greenhouse gas reduction strategies. In addition, to strengthen evaluation methods, there is a need for a unified approach to collecting information and ensuring that comparisons between plans in different regions and localities can be properly measured. We suggest the addition of language calling for the creation of a statewide method for quantifying vehicle miles traveled and other transportation outcomes that affect greenhouse gas emissions.
5. Finally, the scoping plan should highlight specific opportunities for CEQA streamlining. As recognized in SB375, current environmental review practices are often a barrier to the timely and cost-effective implementation of smart growth projects. The scoping plan should provide further recognition of the tendency of this problem to extend to transportation projects that provide alternatives to the automobile. We recommend that the scoping plan call for the State's CEQA Guidelines to be revised to support smart growth land use and transportation projects by replacing references to the congestion-based "automobile level of service" transportation impact measure with a more appropriate measure of a project's effect on the environment. Specifically, the Guidelines should encourage transportation impact evaluation based on the automobile trips generated by the project (or related measures, such as the VMT or greenhouse gas emissions added by the project). These additional revisions should apply, at a minimum, to projects that are consistent with the sustainable communities strategy and/or alternative planning strategy called for in Section 6 of the scoping plan.

We very much appreciate the Air Resources Board's leadership in this important area of policy and are pleased to have the opportunity to comment on the draft scoping plan. Please feel free to contact me at 415.522.4832 should you have any questions.

Sincerely,



Tilly Chang
Deputy Director for Planning

cc: W. Crowfoot, A. Hayati –San Francisco Mayor’s Office of Climate Change and Greening
J. Blumenfeld, F. Khan –San Francisco Department of the Environment
N. Ford, C. Rohan, A. Ghosh, P. Albert – San Francisco Municipal Transportation Agency
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JLM, MEL, AL, BC, ZB, RH, AC, CF, ES, MS – Chron, File: AB 32