

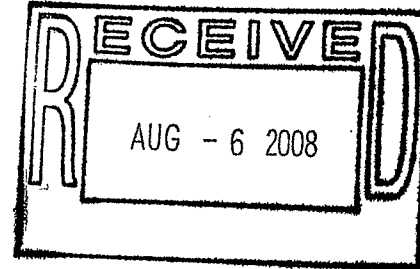


# SAN FRANCISCO PLANNING DEPARTMENT

EO 68-15 OCC  
AUG 6 2008

August 1, 2008

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Re: Comments on Climate Change Draft Scoping Plan (June 2008 Discussion Draft)

Dear Mr. Goldstene:

The City and County of San Francisco appreciates this opportunity to provide comments on the California Air Resources Board's Climate Change Draft Scoping Plan -- June 2008 Discussion Draft. We have worked with key land use and transportation agencies in the Bay Area to review the draft and provide these comments. Overall, we embrace this effort to develop a strategy to reduce greenhouse gas (GHG) emissions and to identify meaningful incentives to reach statewide reduction targets, but wish to emphasize solutions that are capable of incentivizing and delivering immediate reductions in GHG emissions, while also achieving other, pressing State transportation and health goals.

San Francisco has long strived to reduce its carbon "footprint" with a clear set of planning and investment priorities in transit, pedestrian and bicycle transportation, smart growth and environmentally-sound infill-development. As a result, nearly every analysis zone in San Francisco continues to rank in the lowest emissions category among all communities in the entire State. This Scope identifies transportation as the leading generator of greenhouse gasses in California. The Plan, however, does not acknowledge certain current issues that directly bear on transportation and GHG emissions:

- The rise in fuel prices that have led to dramatic shift from private vehicles to transit
- The approaching limits of capacity for mature, well-used transit networks, including San Francisco's, in the State to absorb new riders
- The related strong demand of housing in communities well-served by transit as a lifestyle option requiring less driving, fuel consumption and fewer emissions

- The relative slight decline in housing costs in these already expensive, transit-served communities and the impact on many families seeking affordable housing and close access to transit
- The State of California's decrease in funding support for transit operations
- The increasing demand for repair and rebuilding of aging transit infrastructure and fleet throughout the state

Nor does the Plan emphasize the particular infrastructure and development aspects that have allowed San Francisco and like communities in California to achieve impressive reductions and serve as a working model for the State. Instead, the Plan appears to focus disproportionately on the areas of fuel technology and fuel efficiency of private vehicles, which provide reductions for the short term but do not address the noted current trends and long term problems of sprawl and inefficient land use development in California. The absence of any program that supports transit operations or smarter land use management in the nine Discrete Early Actions underscores our concern. Without a concerted effort to discipline growth into a "smarter" land use/transportation pattern, the development and maintenance of infrastructure in sprawling patterns represents a serious challenge in itself to meeting reduction targets.

We propose that the Plan address these concerns, set reduction targets and provide incentives through techniques such as cap-and-trading in the following ways:

Alleviate the huge challenges to transit operators that have public support but face severe funding constraints in upgrading infrastructure and in efficiently operating service to meet the demands of a significant increased ridership. Enabling transit providers like Muni, BART and Caltrain to be recipients of the cap-and-trade revenues is a critical first step. These transit agencies already demonstrate the capacity constraints of being "too successful" and have clearly stated long-term programs to alleviate overcrowding, transit service congestion and improve service, but lack the significant funds to help meet these needs.

Reward community efforts to support the planning, implementation and maintenance of infrastructure to more closely link land use development and transit/pedestrian networks. The "Local Government Actions" section (13) appears to underestimate the potential for GHG reductions (only 2 MMTCO<sub>2</sub> by 2020, attributed to Regional Actions only) and does not attribute further reductions to the more substantive mode shift policy a Local (rather than Regional) jurisdiction can -- and usually does -- effect. The extensive data and study collected by experts on land use and transportation that identify smart growth and transit coordination as having a profound and long-lasting impact on reducing vehicle-miles traveled and effects a positive trend the longer the community enjoys this coordination (supported by a Statewide 2004 TOD study). The Plan should assess the reduction from this coordination more accurately and include, along with the

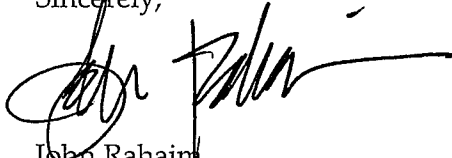
listed "Local Government Actions" on page 32, Community Land Use as an action. Such Action should call for making tighter linkages between development, density and transit/pedestrian infrastructure, particularly in the larger cities with a tradition and demonstrated appeal based on this pattern.

Reprioritize Investments that Achieve Multiple State Goals. Some measures in the Plan, like those for High-Speed Rail, are key to a long-term future benefit but cannot offer relief until the improvement is initiated. It is important to seek immediate GHG reductions, while continuing to work towards long-term strategies. Other measures in the plan, such as the extensive focus on changes to fuel technology and vehicle efficiency, should specifically target funds toward the "greening" of public transit vehicles.

Position California as a Role Model. A revised Plan that more prominently positions transit and land use development investment and maintenance strategies will provide clear, certain benefits and reflect an increasingly popular consensus in reducing GHG emissions. Among the Western Climate Initiative partners, California, with its advanced transit networks and sophisticated land-use policies, can respond more favorably to this shift than states with less history and success in "smart-growth" strategies. These changes allow a target-reduction plan that takes fuller advantage of California's innovative tradition and helps the State set a high standard and serve as an exemplary model for the rest of the WCI partners.

We hope you find these comments useful and instructive, and invite you to contact Neil Hrushowy with any questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "John Rahaim", with a long horizontal flourish extending to the right.

John Rahaim  
Planning Director