

# Transportation Solutions Defense and Education Fund

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May 15, 2013  
By E-Mail

Amy Worth, Chair  
Metropolitan Transportation Commission  
101 Eighth Street  
Oakland, CA 94607

Re: 2013 SCS DEIR Comments

Dear Ms. Worth:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating the regional planning of transportation, land use and air quality at MTC for the past twenty years. We are pleased that, in its first Sustainable Communities Strategy, MTC is no longer planning most of the region's growth to be sprawl on the fringes of the region.

The front page of today's *Chronicle* announces the release of *A New Direction*. (Attachment H.) This U.S. PIRG study captures a profound change in travel preferences, in which millennials drive much less than past generations. This study suggests that agencies like MTC need to recognize a much greater degree of uncertainty in their assumptions about the future, including the magnitude of growth in travel demand for different modes.

MTC should now stop facilitating Single-Occupant Vehicle (SOV) travel. Investing in Express Lanes diverts resources from viable alternatives to SOV travel while merely delaying inevitable gridlock. The public and MTC's own environmental review support shifting funding away from the highway projects in the Proposed Plan.

Atmospheric CO<sub>2</sub> levels reached 400 ppm this week, an event unprecedented in the human habitation of this planet. Reducing GHG emissions from transportation is critical to our state's future, as motor vehicles are the largest GHG-emissions generating sector in California. The Draft 2013 Regional Transportation Plan/Sustainable Communities Strategy (SCS), also known as Plan Bay Area, is an inadequate response to that challenge.

## Introduction

The legislative findings for SB 375 identify that:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve **significant additional** greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)

The Draft 2013 Regional Transportation Plan/Sustainable Communities Strategy will result in:

- an 18% **overall increase** in transportation GHG emissions between 2010 and 2040.<sup>1</sup>
- a 28% **overall increase** in land use GHG emissions between 2010 and 2040.<sup>2</sup>

The addition of the Scoping Plan measures (new vehicle technology and low-carbon fuel) implemented by the Air Resources Board, will reduce emissions enough to create:

- a net 19% reduction in transportation GHGs by 2040.<sup>3</sup>
- a net 12% reduction in land use GHG emissions between 2010 and 2040.<sup>4</sup>
- a net 15% reduction in total regional GHG emissions between 2010 and 2040.<sup>5</sup>

Because the SCS does not reduce 2040 regional GHG emissions apart from reductions from Scoping Plan measures, the SCS violates the legislative intent of SB 375.\* The SCS will interfere with the state's goal of an 80% reduction below 1990 GHG emissions by 2050.

Had the SB 375 GHG emissions reduction targets required an **actual** reduction in GHGs, that would have forced MTC to use its financial resources strategically, in sharp contrast to its past practice. As the mode share chart<sup>6</sup> shows, over a twenty year period, nothing has changed in Drive Alone or Transit mode shares. Carpooling and Walking

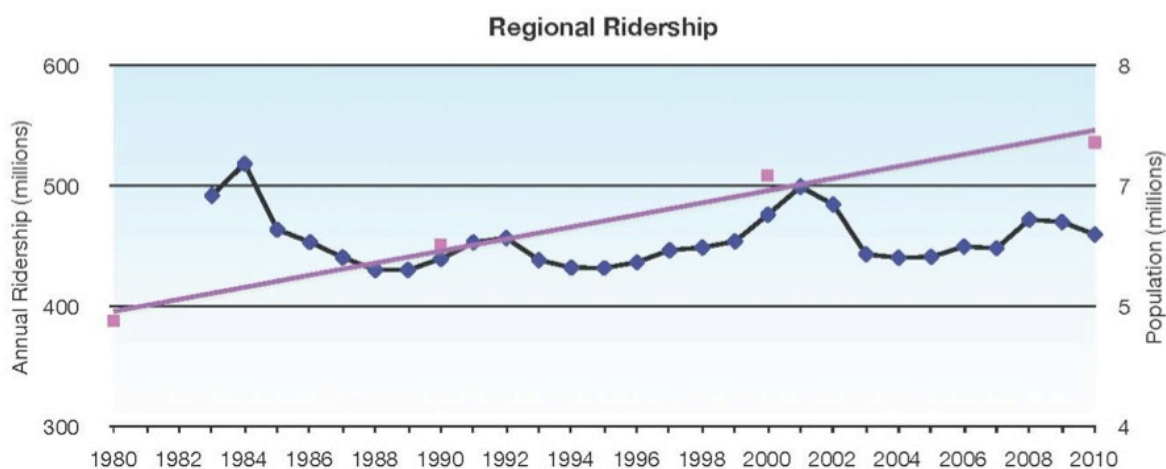
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\* TRANSDEF objected strenuously to ARB's adoption of regional emissions reduction targets recommended by the MPOs including MTC, because it was obvious then that the "GHG emissions reduction targets" would result in actual GHG emissions **increases**. TRANSDEF acknowledges that the SCS per capita GHG reduction achieves the regional emissions reduction target set by ARB, Criterion 1. However, the Bay Area's projected 30% increase in population (p. 3.1-11) will overwhelm the modest 18% per capita transportation GHG reductions (p. 2.5-50), making that reduction meaningless from a climate change perspective.

have declined. Work at Home has doubled, but not because of MTC. Bike access has improved, but that started from a very low base.

Over the past thirty years, MTC has failed to increase transit ridership. (see Regional Ridership chart below. The blue line is annual ridership while the magenta is population.) These two charts demonstrate MTC's inability and/or unwillingness to create a meaningful alternative to solo driving.

In 2001, TRANSDEF litigated MTC's failure to implement TCM 2, a commitment to a 15% increase in regional transit ridership, based on 1982 levels. TRANSDEF and its coalition received a court ruling declaring that MTC had failed to implement TCM 2, and ordering MTC to fulfil its commitment. This decision was later overturned on appeal. Despite a substantial increase in population and many billions of dollars spent on BART extensions, regional transit ridership<sup>7</sup> on the six largest operators has actually fallen since 1982. More than anything else, this chart demonstrates that MTC has no institutional discipline requiring it to achieve results when deploying financial resources.



### The GHG Impact Analysis

While the DEIR's analysis of GHG emissions is far more orderly and clear than SCAG's, for example, it is still inadequate, both in its criteria and its impact analysis conclusions. It fails to clearly distinguish between statewide level and the regional level requirements, and fails to maintain a clear distinction as to which emissions sectors are being counted. Key data are missing that are needed to tie all measurements together to a single point for analysis. For starters, a table of regulatory requirements and another with the performance of the SCS would be helpful. (See Attachments A and B.)

### Scoping Plan

The DEIR failed to demonstrate project consistency with the Scoping Plan's 2020 target of 427 MMTCO<sub>2</sub>e (the 1990 Level).<sup>8</sup> TRANSDEF's analysis is that 21 MMTCO<sub>2</sub>e of reductions are needed to attain the target, starting from the 2010 GHG inventory level of 448 MMTCO<sub>2</sub>e.<sup>9</sup> The Scoping Plan statewide measures for mobile sources, waste, electricity and natural gas sectors total 97.4 MMTCO<sub>2</sub>e (see Attachment D), or 56% of the total Scoping Plan measures. This results in a need for a statewide reduction of 11.8

MMTCO<sub>2</sub>e in these sectors (56% of 21; see Attachment C), which in turn is a 2.6% reduction from the 2010 levels in those sectors. While there are no numeric 2020 data in the EIR, a chart suggests that the 2020 regional GHG emissions in these sectors will be roughly 46.4 MMTCO<sub>2</sub>e,<sup>10</sup> a 4.9% reduction from 2010 levels. The SCS is therefore consistent with the Scoping Plan's 2020 target.<sup>†</sup>

### Criterion 2

Even with the acknowledged need to update the Scoping Plan, the DEIR analyses for 2040 and 2050 are problematic. For 2040, the GHG threshold of significance, Criterion 2, is legally inadequate. The selection of a 'net increase over 2010 GHG levels'<sup>11</sup> as the CEQA threshold of significance for 2040 is arbitrary, capricious and inconsistent with state law. First, as cited from SB 375 *supra*, the region is clearly expected to significantly reduce emissions. Second, a very challenging numeric 2050 target was set by Executive Order S-3-05.<sup>12</sup> While the DEIR claims that MTC is not responsible for implementing the Executive Order,<sup>13</sup> as the legislatively appointed Metropolitan Planning Organization for the Bay Area, MTC is required to operate within the state's policy framework. Under Criterion 2, maintaining level emissions from 2010 to 2040 would result in a finding of No Adverse Impact. That would clearly be contrary to the state's GHG regulatory framework, including SB 375 and Executive Order S-3-05.

Reducing GHG emissions 80% below 1990 levels results in a statewide 2050 target of 85 MMTCO<sub>2</sub>e. This, in turn, is an 81% reduction below 2010 levels. A trendline is needed on Figure 2.5-8, indicating what an 81% reduction looks like. For the mobile sources, waste, electricity and natural gas sectors, a reduction like that would result in total regional 2050 emissions of 9.3 MMTCO<sub>2</sub>e. Compared to such a trendline, it is obvious that the SCS is not doing anywhere near enough to reduce future GHGs.

The FEIR should carefully evaluate the entirety of this data, and make a reasoned determination of the appropriate threshold of significance for Criterion 2, supported by substantial evidence. Clearly, a 0% reduction below 2010 is too low a target for 2040, while an 81% reduction would be too high. The project's emissions reductions would then be compared to that threshold, most likely resulting in a potentially significant impact, for which mitigation strategies would need to be offered.

Rather than wait another 20 years or so to think further about the 2050 target, impacts on the region will be cumulatively less if the region were to proceed with a steeper reductions trendline now. Because such emissions reductions are both compounded by the network effect and cumulative over time, early reductions are much more beneficial than later ones. This was the rationale behind SB 375: change the pattern of land development to lock in lower per capita VMT before 2020, to avoid locking in more

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<sup>†</sup> Upon reviewing ARB's GHG Inventories, it became clear that statewide GHG emissions have already peaked in California, and are now heading downwards, probably because of the 2008 economic downturn. (See Attachment E.) If this trend continues, the Scoping Plan's 2020 Business as Usual GHG emissions projection of 596 MMTCO<sub>2</sub>e (p. 2.5-25) will never be reached. (See linear BAU trendline projection to 2020 on Attachment E.)

Business as Usual development later. More change sooner will make the transition to a low-carbon future less disruptive.

### Criterion 3

TRANSDEF's criticism of the Criterion 3 analysis<sup>14</sup> builds from its criticism of the Criterion 2 analysis. In particular, the following determination as to whether the project would substantially impede the attainment of 2050 goals is a *non sequitur*:

While modeling may not be able to show achievement of an 80 percent reduction today, given the overall downward trajectory beyond 2040, which indicates that implementation of the proposed Plan would not impede achievement of executive order goals, the impact is considered less than significant (LS).<sup>15</sup>

No evidence is offered in support of the allegation that "implementation of the proposed Plan would not impede achievement of executive order goals." Claiming that new technologies and measures will be available by 2050 is mere conjecture. Figure 2.5-7<sup>16</sup> purportedly demonstrates the SCS will not impede. However, even a cursory examination of the chart discloses less than a 20% per capita reduction from 2010 to 2050, a reduction that will be totally offset by population growth. It is not evidence of anything. (These per capita figures are inappropriate for this analysis, as the Executive Order goals refer to total emissions, not per capita emissions.) The finding of No Adverse Impact was in error. The FEIR must acknowledge that the SCS has a Potentially Significant Impact under Criterion 3.

### Criterion 4<sup>17</sup>

The 18% increase in regional transportation GHG emissions<sup>18</sup> over the life of the SCS (prior to Scoping Plan measures) discussed in the Introduction, *supra*, is evidence that implementation of the SCS would be in direct conflict with the GHG emission reduction goals of SB 375. The FEIR must acknowledge that the SCS has a Potentially Significant Impact under Criterion 4, even though there is No Adverse Impact under Criterion 1, the SB 375 per capita GHG emissions goals.

MTC proposed its own per capita emissions reduction targets, and submitted them to ARB. Because they were lower than the rate of population growth, MTC put itself in direct conflict with the goals of SB 375.

The calculations demonstrating the 2020 attainment of Scoping Plan goals, *supra*, need to be part of the analysis of Criterion 4 impacts in the FEIR.

The FEIR should evaluate the 6.6 MT per SP per year threshold of significance recommended by BAAQMD for analyzing plan level impacts.<sup>19</sup>

### Miscellaneous

Please provide the definitions of MMTCO<sub>2</sub>e and MTCO<sub>2</sub>e, perhaps by linking them with a footnote to Table 2.5-1, where they are first introduced.

It appears that the graphing of Figures 3.1-1<sup>20</sup> and 3.1-2<sup>21</sup> is incorrect. Straight lines are extended from the 2010 to 2040 segments back to 1990. This has the bizarre effect of showing the region's historic GHG emissions as being dependent on the choice of an alternative years in the future. Unless 1990 regional GHG emissions can be verified in the FEIR, these straight-line extrapolations should be eliminated.

On p. 2.5-50, the DEIR claims that "The proposed plan also results in an increase in the share of trips that are made by transit and by walking, while drive alone trips are expected to decline." No mode share data is presented to substantiate those claims.

### **Regional Express Lanes Network**

The SCS documents are inconsistent in their characterization of the so-called Regional Express Lane Network Project, RTPID 240741. This project appears in the draft Air Quality Conformity Analysis as operational by 2040 and regionally significant. The only mention of cost in the Regional Express Lane Network section of Plan Bay Area is for \$600 million. (p. 82.) Appendix C displays no construction funding for HOT lanes, yet there is \$600 million in discretionary funds in RTPID 240732 for something called "Grant Funding." These data stand in conflict with those for RTPID 240732, hidden away in an obscure database (<http://www.bayarea2040.com/public/default.aspx>) called Plan Bay Area Project Search. The 5/1/13 printout shows the project will not be operational by 2040, and has no discretionary funds. These discrepancies cast doubt on the entire SCS analysis process, as this database appears to be the master source for the conformity analysis, financial reporting, travel demand modeling and Appendix C.

Worse yet, the database shows a cost of \$6.7B for RTPID 240741, but neither the regional significance box nor a project completion date is checked, implying that this project is not moving forward. However, it is allegedly included in SCS Alternatives 2, 3 and 4. With the documents available to the public, it is impossible to definitively determine whether the biggest single project in the SCS, Express Lanes, is alive or dead.

### **Transportation Impact Analysis**

After extended deliberation and public input, MTC formally adopted these SCS 2040 performance targets for transportation:

Target 9a: Increase non-auto mode share by 10 percentage points (to 26% of trips).

Target 9b: Decrease automobile vehicle miles traveled (VMT) per capita by 10 percent.<sup>22</sup>

However, instead of using these targets as its thresholds of significance, the DEIR ignored mode share entirely, and adopted a different threshold than Target 9b as Criterion 4 : "A substantial increase in per capita VMT compared to existing conditions. A substantial increase in per capita VMT is defined as greater than 5 percent."<sup>23</sup>

CEQA gives the lead agency the discretion to select thresholds of significance, but there must be a rational basis for significance determinations. In this instance, the performance targets were selected as part of a comprehensive planning effort to avoid future adverse environmental and social impacts. These targets were not a means to optimize future benefits. Not achieving these targets would mean that future adverse

impacts would be worsened. Because mode share and VMT were readily available as outputs from the model, these two targets should have been DEIR impact criteria.

The DEIR fails its function as a public information document because it restricts the public's right to know and comment on the failure of the SCS to meet explicit lead agency goals. The selection of thresholds that ignored the policy context for the SCS--the region's need to increase non-auto travel and to reduce VMT per capita--was arbitrary and capricious, and a blatantly improper attempt to avoid a finding of an unavoidable significant impact. The Impact Analysis for the Transportation section of the DEIR is legally inadequate. There is no legal justification for avoiding the process of public comment under CEQA.

Even though Target 9a explicitly required calculating mode share, we were unable to find any results reported in the DEIR. This is inconsistent with 20 years of MTC's EIR practice. Plan Bay Area reported only a 4 percentage point increase was achieved.<sup>24</sup> The SCS resulted in a 2040 per capita VMT decrease of 6%,<sup>25</sup> which was reported in Plan Bay Area as a 9% decrease.<sup>26</sup> No matter which of these results was more truthful, both failed to reach the 10% Target 9b. Although these performance targets were evaluated in the Plan Bay Area document, their omission from the DEIR appears to be the burying of bad results.

As discussed in detail in *A New Direction* (Attachment H), the future of VMT growth is quite uncertain. Figure 9 on page 30 displays the historic trend for VMT, along with three future scenarios: Back to the Future, Enduring Shift, and Ongoing Decline. What VMT growth assumptions are built into MTC's travel demand model? Has the model been accurate in backcasting the decline in VMT since 2004? Is there any reason to have confidence in the model's projections if future travel demand remains lower than the historic trend?

Finally, the transportation analysis excludes intrazonal travel.<sup>27</sup> We are concerned that this distorts the overall results and fails to provide the fine-grained detail needed to evaluate the multimodal performance of PDA policy sets.

### **Feasible Mitigations**

Had the Criterion 2 significance threshold been set properly, the DEIR would have identified the 15% reduction of GHG emissions in 2040 relative to 2010<sup>28</sup> as a significant unavoidable impact, because it will interfere with attaining the state's adopted goal of an 80% reduction by 2050.

Had the Criteria 3 and 4 analyses been done properly, the DEIR would have identified the 20.5% reduction of GHG emissions in 2050 relative to 2010<sup>29</sup> as a significant unavoidable impact, because it will interfere with attaining the state's adopted goal of an 80% reduction by 2050, and with the Scoping Plan's emissions reduction goals.

The draft SCS had other significant impacts:

“Congested per capita VMT would increase by 29 percent during the AM peak hours, by 71 percent during the PM peak hours, and by 51% for the day as a whole. These

roadway traffic service levels reflect the impact of total VMT growth far exceeding the growth of roadway capacity.”<sup>30</sup>

In addition, had the impact criteria been legally adequate (see Transportation Impact Analysis, *infra.*), there would have been two additional significant impacts: a failure to reduce per capita auto VMT by 10% (only a 6% reduction was achieved<sup>31</sup>) and a failure to increase non-auto mode share by 10 percentage points (only a 4 percentage point increase was achieved<sup>32</sup>).

CEQA mandates that agencies not approve projects that will do significant environmental damage if mitigation is available and feasible. (Public Resources Code, §§ 21002, 20181(a); *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 361-62.) TRANSDEF identifies the following mitigations as available and feasible:

1. Alternative 5, the Environment, Equity, and Jobs Alternative (EEJ), has the lowest Daily VMT<sup>33</sup> of the alternatives. It would have had the lowest per capita Daily VMT, had the analysis<sup>‡</sup> not artificially lowered the population.<sup>34</sup> It is clear that the model validated the premise that VMT could be reduced by increasing the supply of local bus transit and deferring the construction of additional highway facilities. Therefore, those elements of the the EEJ Alternative must be moved into the Final SCS.
2. In addition to reducing VMT, the EEJ alternative had the lowest 2040 transportation GHG emissions<sup>35</sup> and the lowest total regional GHG emissions<sup>36</sup> of all the alternatives. These results strengthen CEQA's mandate requiring the selection of the least impactful alternative.
3. The EEJ's Vehicles In Use is 1.6% lower than that of the Proposed Plan.<sup>37</sup> (The DEIR does not explain how this term is different from Auto Ownership, or why EEJ would have a 1% higher Average Vehicles per Household.<sup>38</sup>) Because the availability of a vehicle is one of the most important determinants of mode choice, any other elements of EEJ that influence auto ownership must be moved into the Final SCS.
4. Because car sharing is a direct method of supporting lower auto ownership, the Final SCS should contain additional policies that support car sharing. OBAG grants could be conditioned on the adoption of rules requiring a minimum number of car sharing spaces in new projects within PDAs, and on PDA streets.
5. The SCS contains committed highway capacity expansion projects as well, including elements of the Regional Express Lane Network. Given the success of the EEJ in reducing projected VMT and GHGs, the FEIR must study an alternative that eliminates all highway capacity-increasing projects that are not yet under contract, and compare the trade-offs with other alternatives.

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<sup>‡</sup> To be credible, any change in assumptions significant enough to change the impact ranking order for alternatives must be demonstrated, in the DEIR, to be non-arbitrary.



6. The BART Berryessa to Santa Clara extension is shown in the SCS as having a Benefit/Cost ratio of 5, with a price tag of \$4.094 billion.<sup>39</sup> Given that the Van Ness Avenue BRT is able to achieve a B/C of 6 for only \$140 million,<sup>40</sup> this analysis is asserting that the BART extension produces 29 times the benefits of the BRT project. TRANSDEF finds this result unbelievable. As demonstrated above, MTC's transit investments over the past 30 years have failed to increase regional transit ridership. That history of over-promised benefits is a strong evidentiary basis for seriously doubting this benefit calculation. Because of the extraordinary cost of this project and MTC's historic failure to achieve transportation results, the FEIR must test an alternative that excludes this BART project. It is feasible to shift the funding proposed for this project, as it is not under contract. Eliminating the most expensive project and shifting the funds to smaller unfunded transit projects that are cost-effective should benefit a much larger transit-riding population, thereby reducing the significant adverse impacts of the draft SCS.
7. RTPID 94525 discloses \$43.5 billion for BART's capital and operations, while RTPID 94636 discloses \$49 billion for Muni's capital and operations.<sup>41</sup> These two exceptional outlays demand close MTC supervision, as they represent a very large share of the region's resources. Given the past 30 years failure to achieve meaningful statistical results, MTC must develop an oversight plan to ensure that these extraordinary sums achieve maximum reduction of significant impacts, and achieve maximum benefits for the region.
8. Funds saved through the cancellation of projects described above could be reprogrammed as additional transit operations funding to support the EEJ program (via a swap with a sales tax agency like LACMTA, if a change in the color of money is needed), or additional OBAG funding to support PDA infrastructure.

TRANSDEF proposed a similar program in its 2005 Smart Growth Alternative.<sup>42</sup> It excluded the BART Extension to San Jose via Warm Springs, the Central Subway and all highway expansions. In their place was a broad network of Rapid Buses, with commuter rail in the North Bay. The FEIR found it to be the Environmentally Superior Alternative, and demonstrated that the approach reduced VMT and provided the most benefits to low-income communities. Its program could readily serve as a source of mitigation projects.

In addition, TRANSDEF proposes as feasible mitigations the series of mitigations adopted by SCAG for its SCS, making those mitigations feasible by definition. Attachment F to these comments is the Appendix G that was adopted by SCAG as part of its SCS Final EIR. The GHG and Transportation measures excerpted below from Attachment F will be the ones most relevant for MTC. Appendix G was intended to provide local jurisdictions with a list of mitigations to consider, when adopting local projects.

Because SB 375 preserved local jurisdictions' land use autonomy, the accomplishment of regional GHG emissions reductions is dependent on the voluntary actions of many

decisionmakers, requiring incentives. TRANSDEF urges MTC to select elements from Appendix G for a carefully constructed set of prerequisites to qualify local jurisdictions for the receipt of OBAG funds.

Please note that SCAG was overly solicitous of the autonomy concerns of local jurisdictions, and phrased each proposed mitigation with a “may.” This approach lacked the needed reminder that lead agencies are required under CEQA to adopt all feasible mitigations, in an enforceable effort to reduce impacts to the maximum extent feasible.

TRANSDEF suggests the following measures from the Attorney General’s list:

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation
- Build or fund a major transit stop within or near development
- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers
- Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments
- Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

**GHG2:** Project sponsors may require Best Available Control Technology (BACT) during construction and operation of projects, including:

- a) Solicit bids that include use of energy and fuel-efficient fleets;
- b) Solicit preference construction bids that use BACT, particularly those seeking to deploy zero- and/or near-zero emission technologies;
- c) Employ use of alternative fueled vehicles;

**TR12:** Project sponsors of a commercial use may submit to the Lead Agency (or other appropriate government agency) a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The sponsor may implement the approved TDM plan. The TDM should include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use. All four modes of travel may be considered. Strategies to consider include the following:

- Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement
- Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)
- Signage and striping onsite to encourage bike safety
- Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials
- Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan.
- Direct transit sales or subsidized transit passes
- Guaranteed ride home program
- On-site carpooling program
- Distribution of information concerning alternative transportation options
- Parking spaces sold/leased separately

- Parking management strategies; including attendant/valet parking and shared parking spaces

**TR43:** Transit Funding: Local jurisdictions may prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, including:

- Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic;
- Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.

**TR67:** Parking Policy: Local jurisdictions may adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:

- Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
- Eliminate or reduce minimum parking requirements for new buildings;
- “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
- Use parking pricing to discourage private vehicle use, especially at peak times;
- Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities;
- Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times;
- Encourage shared parking programs in mixed-use and transit-oriented development areas.

TRANSDEF appreciates this opportunity to comment on the 2013 SCS DEIR. We would be pleased to assist in the development of any of the ideas suggested herein.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President

Copies

Lisa Trankley, DOJ

Doug Ito, ARB

Jack Broadbent, BAAQMD

Steve Heminger, MTC

Ezra Rapport, ABAG

Attachments

- A- GHG Emissions Reduction Targets
- B- SCS Performance Re: Targets
- C- Scoping Plan Targets
- D- Scoping Plan Measures Not Included in Regional Totals
- E- CA GHG Emissions
- F- SCAG SCS FEIR Appendix G
- H- *A New Direction*, U.S. PIRG, 2013

## DEIR Page References, unless otherwise noted:

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- <sup>1</sup> 2.5-55
  - <sup>2</sup> 2.5-53
  - <sup>3</sup> 2.5-55
  - <sup>4</sup> 2.5-54
  - <sup>5</sup> 2.5-56
  - <sup>6</sup> 2.1-15
  - <sup>7</sup> Data from Statistical Summary of Bay Area Transit Operators, MTC, various years.
  - <sup>8</sup> Adopted Scoping Plan, Air Resources Board, 2008; p. 5
  - <sup>9</sup> [http://www.arb.ca.gov/cc/inventory/data/tables/ghg\\_inventory\\_ipcc\\_00-10\\_sum\\_2013-02-19.pdf](http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_ipcc_00-10_sum_2013-02-19.pdf) and [http://www.arb.ca.gov/cc/inventory/archive/tables/ghg\\_inventory\\_ipcc\\_90\\_04\\_sum\\_2007-11-19.pdf](http://www.arb.ca.gov/cc/inventory/archive/tables/ghg_inventory_ipcc_90_04_sum_2007-11-19.pdf)
  - <sup>10</sup> 2.5-59
  - <sup>11</sup> 2.5-41
  - <sup>12</sup> 2.5-24
  - <sup>13</sup> *Id.*
  - <sup>14</sup> 2.5-57
  - <sup>15</sup> 2.5-60
  - <sup>16</sup> 2.5-58
  - <sup>17</sup> 2.5-60
  - <sup>18</sup> 2.5-55
  - <sup>19</sup> CEQA Air Quality Guidelines, BAAQMD, June 2010, p. 9-3
  - <sup>20</sup> 3.1-63
  - <sup>21</sup> 3.1-64
  - <sup>22</sup> Plan Bay Area, p. 103
  - <sup>23</sup> 2.1-23
  - <sup>24</sup> Plan Bay Area, *Id.*
  - <sup>25</sup> 2.1-28
  - <sup>26</sup> Plan Bay Area, *Id.*
  - <sup>27</sup> 2.1-28, FN 2
  - <sup>28</sup> 2.5-56
  - <sup>29</sup> 2.5-59, interpolated from Figure 2.5-8
  - <sup>30</sup> 2.1-32
  - <sup>31</sup> 2.1-28
  - <sup>32</sup> Plan Bay Area, *Id.*
  - <sup>33</sup> 3.1-24
  - <sup>34</sup> 3.1-29, FN 3

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- <sup>35</sup> 3.1-59  
<sup>36</sup> 3.1-61  
<sup>37</sup> 2.1-38 [sic. --should be 3.1-38]  
<sup>38</sup> 3.1-11  
<sup>39</sup> Plan Bay Area, p. 113  
<sup>40</sup> *Id.*  
<sup>41</sup> DEIR Appendix C, p. C-2  
<sup>42</sup> See 2005 RTP FEIR.