

Transportation Solutions Defense and Education Fund

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October 10, 2014
By E-Mail

Dana Armanino, Planner
Sustainability Team
Marin County Community Development Agency
3501 Civic Center Drive, Rm. 308
San Rafael, CA 94903

Re: Marin County Climate Action Plan, Public Draft

Dear Ms. Armanino:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating for the regional planning of transportation, land use and air quality. Our focus in recent years has been reducing the climate change impacts of transportation.

TRANSDEF applauds your Sustainability Team for its inspiring Public Draft version of the Marin County Climate Action Plan (the "Plan" or "CAP"). The Plan is visually very attractive. We are especially heartened by the leadership the Team demonstrated by proposing the stepping up of the GHG emissions reduction goal for the unincorporated community. This kind of leadership is all too rare in government these days.

Due to a pressing schedule of comments needed on statewide issues, we are not able to devote the time to the kind of detailed comments that the Plan deserves. Recognizing that these are by no means meant to be comprehensive, here are a few comments:

As the largest emissions sector for the unincorporated area (see Figure ES-1, the Plan), transportation needs to be a more prominent part of the solution. We suggest that the emissions reduction goals for transportation are much too low.

Tiering off a Climate Action Plan

TRANSDEF supports the project streamlining role of the Plan: to provide a simple and clear-cut method of demonstrating that a project undergoing environmental review has a less-than-significant cumulative impact on GHGs. Two steps are needed before tiering can be made available: The Plan itself must undergo CEQA review, and the measures must be compiled into a separate list. We find that Appendix C is not adequate for that latter purpose, as it would be unnecessarily confusing to applicants.

To be useful in the real world, the strategies provided to project applicants need to be simple, clear, directive, and uncluttered by theory, explanation or analysis. In other words, the strategies need to be distilled from the text of the Appendix before they can be useful. Because the strategies become part of the development entitlement process, there must be no wiggle-room or ambiguity in how they are drafted. The Plan should explicitly state that these strategies are to be included as conditions of project approval, with appropriate enforcement mechanisms.

We suggest that the Plan call for a checklist of measures that would become part of project environmental review. That list could be subject to its own comment period and come before the Board of Supervisors for approval at the same time as the Plan.

Transportation Measures

Trans-1 calls for mixed-use development near high-quality transit (p. C-34). Marin currently has no high-quality intracounty transit. A substantial increase in operations funding is needed to provide the 15-minute service on major thoroughfares that is the definition of high-quality transit. With transit service only every 30 or 60 minutes, Trans-1 cannot be implemented, because it will be impossible to build the significant choice ridership needed to make TOD work.

Providing transit for TOD is a chicken-and-egg problem. It is difficult to make one of them happen in the absence of the other. TRANSDEF believes the transit needs to be in place first to catalyze the development choices that result in TOD. That's why we stress the importance of securing the resources for Trans-2.1 (p. C-40). (see below for a discussion of funding.) We don't see TOD happening without the "T."

Given the prominence of motor vehicles in the community inventory, we suggest that measure Trans-1.3's achievement of 0.2% of local reductions (p. C-38) is wholly inadequate. A higher VMT reduction goal would be appropriate. We see no substantive reason for the choice of a 10% VMT reduction goal. While it is the goal selected by MTC for its 2013 Sustainable Communities Strategy, that choice is certainly not binding on Marin. Recent countywide transportation plans by Alameda and Contra Costa Counties have shown marked increases in VMT, on the order of 46% and 35% respectively. It would be highly desirable for Marin to set a different kind of example, where VMT is stable or falls over time.

Just as the expected results are overly low for Trans-1.3, it is clear to us that they are overly high for Trans-1.5, Transportation Marketing (p. C-39). TRANSDEF has seen these programs before, and we are not overly enthusiastic about them. Achieving 87.6% of the CAP's transportation results from this measure seems wildly inflated.

The discussion of per-passenger GHG emissions (p. C-42) should be expanded to include these points: 1) The successful implementation of the CAP should result in higher transit vehicle occupancies than the present. 2) Massive congestion in Marin increases the co-benefit value of transit service, especially where buses operate in HOV lanes. TRANSDEF has proposed the creation of peak-hour HOV lanes on arterials.

Transportation Funding

The Plan's methodology of dividing the County into jurisdictions and focusing only on the unincorporated areas misses the forest for the trees: It ignores the County's special dual role. The County of Marin is both one of the 12 Marin jurisdictions creating CAPs, and is also the entity that creates transportation plans for the entire county. Unsurprisingly, the County's Countywide Plan Transportation element has countywide impacts, especially its Implementing Programs TR-1.g, Determine Appropriate Mitigation, and TR-1.j, Install Highway Improvements.

The time has come for a thorough review of the 2007 Countywide Plan Transportation element. The element is internally self-contradictory: The highway improvements facilitate more solo driving, while other policies are designed to reduce driving. The time has come to fully align the Transportation element with the County's climate goals. Policy coherence will require shifting funding priorities away from facilitating solo driving.

In hindsight, it is clear that Policy TR-1.1 was never implemented:

TR-1.1 Manage Travel Demand. Improve the operating efficiency of the transportation system by reducing vehicle travel demand and provide opportunities for other modes of travel. Before funding transportation improvements consider alternatives — such as Transportation Demand Management (TDM) — and prioritize projects that will reduce fossil fuel use and reduce single-occupancy vehicle trips.

TDM has been ignored while transportation improvements continue to get funded. As a result, travel demand has continued to grow. Massive congestion indicates that Policy TR-1.8, Reduce Vehicle Miles Traveled, has entirely failed.

The update of the Climate Action Plan is the appropriate moment to reevaluate the climate-related internal contradictions in the Transportation Element of the Countywide Plan. The CAP should include an action item:

- Review Countywide Plan Transportation Element for opportunities to reduce transportation-related GHG emissions. Give funding priority to CAP measures.

While the County does not control the Transportation Authority of Marin, it does have five votes on TAM's Board. The Countywide Plan and the Supervisors have a lot of influence over TAM project funding decisions. It would be a serious oversight to not harness the County's role in transportation planning and funding as a major component of a coherent Climate Action Plan.

TAM's highest priority is supporting solo driving. It has spent over \$200 million widening highways. Continuing to prioritize funding this way will impede the attainment of the 80% reduction in transportation emissions called for in Governor Brown's Executive Order. With recent science suggesting that climate models have been too conservative, achieving that 80% reduction will probably need to come before 2050.

Appendices

We found the collection of data in the Appendices to be very helpful. Appendix D, the Funding and Financing Options paper, should be especially helpful. Thank you for thinking of including it. We likewise appreciate the Literature Cited Appendix and the Inventory and Forecast Details Appendix.

To make it easier to find the individual component parts of Appendix C, we recommend using very visual section headings to separate 'State Emissions Reduction Strategies' from 'Local Emissions Reduction Strategies--Community' from 'Local Emissions Reduction Strategies--Municipal' from 'Supporting Strategies-Municipal' and 'Supporting Strategies--Community.' Each of these headings should be placed at the top of a new page, to make them easier to find.

We found it odd that the Supporting Strategies-Municipal section of Appendix C reused the very same measure names as Supporting Strategies--Community. It would be far better practice to use unique names for each measure in Appendix C.

Inventories

Our experience with statewide inventories calls into question the exceedingly gentle slope of your projection on page 4-2. Please see our chart on the last page of this letter: http://transdef.org/index_assets/ARB%20Scoping%20Plan%20Update%20Comments.pdf

Forestry Quandry

We wanted to call your attention to a counterintuitive opinion piece published in the New York Times on September 17, 2014. Nadine Unger, an atmospheric chemist, contends in "To Save the Planet, Don't Plant Trees" that there is a paradoxical effect from planting trees. The implication is that natural lands sequestration is not in any way straight forward. We have no way to evaluate her opinions, but thought you should be aware of them, as they relate to strategies such as SP Land Conservation-2, Create New Vegetated Open Space.

We appreciate this opportunity to provide our comments on the Climate Action Plan. We would be pleased to assist in the further development of TDM measures.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

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