

Transportation Solutions Defense and Education Fund

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June 20, 2009
By E-Mail

Mike Kerns, Chair
Sonoma County Transportation Authority
490 Mendocino Avenue, Suite 206
Santa Rosa, CA 95401

Re: Comprehensive Transportation Plan Draft EIR Comments

Dear Supervisor Kerns:

TRANSDEF, the Transportation Solutions Defense and Education Fund, is a Marin-based environmental organization focused on climate change and the regional planning of transportation, land use and air quality in the San Francisco Bay Area. For the past 15 years, we have participated in MTC's development of Regional Transportation Plans and BAAQMD's development of Clean Air Plans.

From that experience base, we seek to offer our comments first on the merits of the Comprehensive Transportation Plan (Plan, or CTP), and then on its faulty analysis in the Draft Environmental Impact Report (DEIR). The improper framing of the No Project Alternative hides the impacts of the CTP, thereby depriving decisionmakers of the information they need to make sound policy choices for Sonoma County, and preventing the identification of adequate mitigations for those impacts. TRANSDEF will identify in this comment letter the full set of reasons why the DEIR is inadequate.

Excessive VMT Growth--Merits of the CTP

The DEIR reveals a Business-as-Usual plan that is unresponsive to the challenges of climate change. Rapidly developing science points to the need to urgently reduce greenhouse gas (GHG) emissions in the near-term. Just last week, government scientists released a report detailing how global warming is already having harmful effects. Its message for decisionmakers was:

Reducing emissions of carbon dioxide would lessen warming over this century and beyond. Sizable early cuts in emissions would significantly reduce the pace and the overall amount of climate change. Earlier cuts in emissions would have a greater effect in reducing climate change than comparable reductions made later. (*Global Climate Change Impacts in the United States*, p. 9. (attached))

Because motor vehicles emit roughly 60% of the GHG emissions from Sonoma County, the CTP carries a heavy burden to accomplish actual emissions reductions. The DEIR asserts that by adopting the CTP, GHGs will decrease by 21.6% from existing conditions by 2035. This projection may be grossly in error, as it conflicts with the DEIR's finding that gasoline consumption will increase by 25% over the same time period. Even if this result turns out to be valid, this reduction can be entirely attributed to an increase in fuel economy of 61.9%, rather than anything specific to the CTP itself.

The CTP has failed to accomplish its goal of reducing transportation-related GHGs by 2015 to 25% below 1990 levels, and by 2035 to 40% below 1990 levels. It is clear to TRANSDEF that the problem is that the CTP has failed to significantly reduce the growth in VMT. The DEIR projects a 26% increase in VMT by 2035, despite the CTP's Objective 3A, "Reduce VMT per capita by 10% below 2005 levels by 2035."

Acknowledging that the Plan does not accomplish its goals is the crucial step in changing course. The question then is whether those goals are important enough to warrant making substantial changes to the Plan--to attempt practices that are uncomfortable, unfamiliar and/or uncommon. Accomplishing those goals will require the courage to innovate. There is no easy way to achieve those goals.

We see this Plan's principal focus as the improvement of travel conditions for single-occupant vehicles. That's the policy-neutral way of saying "congestion relief." It's why we called this CTP a business-as-usual plan. This is the approach to transportation seen across most of America. While SCTA's state mandate to reduce congestion has not yet been broadened in response to the current realities of climate change, Caltrans is moving forward with an entirely new approach that brings together land use and transportation planning in the era of SB 375 that it calls the Smart Mobility Framework.¹ We urge decisionmakers to consider the far-reaching critique of congestion relief accomplished by means of conventional widening projects in *Smart Congestion Reductions--Reevaluating The Role Of Highway Expansion For Improving Urban Transportation [aka Smart Transportation Investments]* (attached).

We don't believe the Plan's goals are achievable while pursuing the business-as-usual approach to congestion relief. We instead recommend relying on alternative approaches, such as are described in *Win-Win Emission Reduction Strategies* (attached). One of the key strategies is road pricing. TRANSDEF urges SCTA to adopt a CTP Alternative that includes road pricing. Recognizing that the County cannot undertake pricing all by itself, and that pricing needs to be a regional effort, we recommend that the CTP commit to advocate at the regional, state and federal levels to secure authorization to increase the cost of driving, through such methods as road pricing, congestion pricing, and parking fees on all commercial parking spaces (including privately owned spaces).

¹ <http://dot.ca.gov/hq/tpp/offices/ocp/smf.html>

Current literature, including the recent report *Cost-Effective GHG Reductions through Smart Growth & Improved Transportation Choices* (attached) identify approaches to VMT Reduction that go beyond what has been included in the CTP. MTC's analysis of the Scenario Assessment component of the 2009 RTP process concluded that the joint implementation of pricing and compact land use was necessary to enable the region to reach AB 32 goals. To attain its own goals, SCTA's preferred Alternative should utilize both approaches.

The 26% increase in VMT is clearly related to the CTP's inclusion of widening projects that increase the lane-miles of highways and roadways. Current research has determined that a 10% increase in lane-miles will increase VMT by 5.5%. (*Growing Cooler*, p. 12 (attached).)

The most-effective policy sets combine land use policies, such as compact growth, with strong transit provision and **not expanding highway capacity**. The addition of auto pricing policies, such as fuel taxes, work trip parking charges, or all-day tolls increases the effectiveness of the land use and transit policies. Peak-period tolls, by themselves, increase travel. Expanding road capacity, along with transit capacity, but without changing market incentives to encourage more efficient use of existing roads and parking, results in expensive transit systems with low ridership. (*Review of U.S. and European Regional Modeling Studies of Policies Intended to Reduce Motorized Travel, Fuel Use and Emissions*, p. 1. (attached) (emphasis added.))

Based on that review and *Smart Congestion Reductions* (mentioned above), SCTA should eliminate some or all of its highway and roadway widening projects while instituting more transit service, parking charges and all-day tolls. The most obvious expansion project to eliminate would be the Marin-Sonoma Narrows HOV/HOT lanes, since that project will encourage more long-distance driving in a corridor that will soon have an excellent transit alternative. That widening project contradicts the County's policy of discouraging the creation of bedroom communities for adjoining counties.

No Project Alternative

The No Project Alternative assumes that in 2035, everything contained in past CTPs has been built. Instead, the Alternative should have represented the existing transportation network as it would function with 2035 population and land use. It improperly includes transportation projects from past plans that have not yet been built. This sleight-of-hand hides the impacts of most of the transportation investments in the CTP by including them in the 2035 baseline, thus making the CTP appear far more benign than is justified. The DEIR defines the No Project Alternative:

The No Project/No Action alternative addresses the effect of not implementing the 2009 CTP. This includes a set of transportation projects and programs that are in advanced planning stages and assumes that all reasonably foreseeable projects and programs (i.e., projects that are fully funded, programmed and/or have cleared the environmental phase) from the adopted 2004 CTP and 2009 Regional Transportation Improvement Program are implemented, but that all other projects and programs do not proceed forward. (p. 6.0-2. (Unless otherwise noted, all page references are to the CTP DEIR.))

This is not a new issue. In a letter addressing this precise topic, the California Attorney General commented to MTC that

CEQA requires that an EIR evaluate the potential environmental impacts of an entire project, which in this context we believe represents the entire \$223 billion of authorized expenditures – not just the \$31.6 billion for projects MTC identifies as ‘discretionary,’ but also the \$191 billion for projects identified as ‘committed,’ projects included in the prior Transportation Plan but not yet constructed. (Letter to MTC, Oct. 1, 2008, at 5. (attached))

The “entire project” must be compared to a “No Project” alternative that represents 2035 conditions without the expansion projects approved previously, but not yet constructed. Instead of comparing the new Plan with existing conditions, the DEIR improperly compares the new CTP with the old CTP. As a result, the DEIR fails to properly examine project impacts.

The CEQA Guidelines clearly distinguish conventional physical projects from land use plans and regulatory plans. A CTP should be treated as a collection of actual physical projects, which bear no resemblance to the mere concepts that make up the content of a land use plan. A CTP’s No Project Alternative should be seen as a no build alternative, viewed at an analysis point decades hence:

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. ... In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not

result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. (Section 15126.6(e)(3)(B))

On the basis of this Guideline, the inclusion of previously approved but unconstructed projects in the No Project Alternative is improper. Those projects must be instead included in the Build alternatives.

New Project Alternative

Even though the project list for the No Project Alternative is highly flawed (see above), it is still instructive as to the VMT impacts of highway widening. The only difference we can find in freeway projects when comparing the No Project Alternative to the CTP is that the latter adds a capacity increase to the Marin-Sonoma Narrows (the project was not fully funded in 2004--only safety improvements were funded back then.)

A careful viewing of Table 6.0-2 on page 6.0-32 indicates that the CTP results in a 3% increase in freeway VMT. This represents a 1% increase in countywide VMT! What else can that be other than an increase in long distance driving through the Narrows? Unfortunately, the DEIR alternatives analysis gives no information about transit mode share. Was SMART ridership higher for the No Project Alternative?

Given how difficult it is to reduce VMT, this observation offers a golden opportunity to consider approaches that might attain Plan Objective 3A, the 2035 reduction of per capita VMT to a level 10% below 2005 levels. We urge SCTA to construct a variant of DEIR Alternative 3, in which funding for the capacity expansion of the Marin-Sonoma Narrows is transferred to SMART and the bus system, to maximize transit availability. Add to this alternative the pricing elements of Alternative 4. Eliminate the widening of local roads, to test whether demand management via pricing and travel choice can reduce the impacts of growth enough to make it possible to postpone those widenings.

Comments on DEIR Text (keyed to DEIR page numbers)

3.0-16: The assumed 2035 gasoline price of \$7.47 in today's dollars indicates the presence of a carbon tax (as disclosed on p. 6.0-17). Was it the intention of the EIR preparer to have a carbon tax for all alternatives, or was it supposed to be only associated with Alternative 4, the Pricing Alternative? What was the basis for assuming this particular level of carbon tax?

4.2-6: While it is literally true that "The ozone designation is nonattainment/transitional, denoting that the area is close to attaining the standard" it is widely recognized that higher local temperatures resulting from global warming will worsen ground level ozone concentrations. Because of this trend, there is no evidence that the area is close to attainment, or that it could remain in attainment.

4.2-7: The mobile sources contribution to PM emissions in Table 4.2-5 appears to be in error. Automobiles are known to emit about 10 mg. of PM per mile.² With a 2005 VMT of roughly 11 million miles, this should have resulted in a combined total PM of at least 46 tons/year, not 3.6.

4.2-13: After checking directly with BAAQMD, TRANSDEF is clear that there is no evidentiary basis for the assertion that “However, this criterion is applied to general plans that induce growth, not to transportation plans that manage planned growth.” This notion was apparently concocted by the EIR preparer to avoid having to acknowledge significant impacts in the air quality area. It must be deleted, and Impact 4.2-1 be corrected to indicate an inconsistency. Table 4.2-8 clearly indicates that VMT is projected to grow faster than population, thereby generating a significant impact according to the 1999 BAAQMD CEQA Guidelines. Mitigation is required.

4.2-17: There is no evidence in the DEIR to support the statement: “As noted in Impact 4.2-1, the CTP would reduce the rate of growth of VMT over existing conditions to a rate closer to the projected population growth rate.” There is neither any data on the existing rate of VMT growth, nor any justification for a claimed causal relationship between a reduction in that rate and the CTP. Delete this statement.

4.2-17: The reduction of ozone precursors between 2008 and 2035 is almost entirely due to factors unrelated to the CTP--tightened state tailpipe emissions standards being the most important. It is fallacious to claim that “The decrease in emissions results from a number of factors, including the CTP’s reductions in travel activity ...” when Table 4.2-8 clearly indicates that VMT is projected to increase dramatically during that period.

4.2-17 & -18: It is grossly inaccurate for the DEIR to claim that “These mobility and air quality benefits would help the county achieve its four transportation and air quality benchmarks” when Policy 3 goals have not been achieved.

4.2-18: There is no evidence in the DEIR to support the assertion that “the proposed CTP would not cause increases in emissions from the transportation sector” In fact, the incorrect and illegal framing of the No Project Alternative (see above) prevents the reader of the DEIR from determining the full impacts of the CTP. In the absence of a No Project Alternative that contains no projects other than the ones currently under construction contract, it is impossible to accurately determine the impacts of the full set of projects listed in the CTP. More than likely, the increased highway and roadway capacity of the projects in the CTP are directly responsible for an increase in emissions

² W.R. Pierson, A.W. Gertler, N.F. Robinson, J.C. Sagebiel, B. Zielinska, G. Bishop, D.H. Stedman, R.B. Zweidinger, and W.D. Ray (1996). Real-world automotive emissions – summary of studies in the Fort McHenry and Tuscarora Mountain Tunnels *Atmos. Env.* **30**, 2233-2256.

A.W. Gertler (2005) Diesel vs. gasoline emissions: Does PM from diesel or gasoline vehicles dominate in the US? *Atmos. Env.* **39** 2349-2355.

M. Abu-Allaban, J.A. Gillies, and A.W. Gertler (2003) Application of a multi-lag regression approach to determine onroad PM₁₀ and PM_{2.5} emission rates. *Atmos. Environ.* **37**, 5157-5164.

from the transportation sector. Current research has determined that a 10% increase in lane-miles will increase VMT by 5.5%. (*Growing Cooler*, p. 12 (attached).)

4.2-18: Table 4.2-3 indicates that the Bay Area has a non-attainment status for the State standards for PM₁₀ and PM_{2.5}, along with non-attainment of the Federal PM 2.5 standard. Thus, because the region is already violating air quality standards, and because the increase in PM emissions acknowledged in Impact 4.2-3 can only delay attainment, the following misstatement must be deleted from the EIR: "However, these emissions would not lead to any violation of air quality standards, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase of emissions of PM₁₀ and PM_{2.5}, as these emissions are factored into the BAAQMD's plan to attain federal and state particulate standards." TRANSDEF has been actively involved in all of BAAQMD's plans to attain federal and state standards since the 1990's. If there was an Implementation Schedule for particulates, it was not adopted with any kind of public outreach process. TRANSDEF has never seen it, and it is not available on BAAQMD's new website. However, based on years of experience, we strongly suspect that the so-called Schedule does not constitute a valid "plan to attain federal and state particulate standards." It is certainly not a SIP. Please note that MTC's FEIR for the 2009 RTP acknowledged a significant cumulative impact of increased emissions of PM₁₀ and PM 2.5 over existing conditions. (DEIR p. 2.2-21.) Impact 4.2-3 must be revised to acknowledge a significant and unavoidable impact, for which mitigation must be offered.

4.2-18: The following sentence asserts that something entirely irrelevant to an analysis of PM emissions, namely the Ozone Strategy, has a bearing on evaluating the significance of PM emissions: "Because the CTP is consistent with BAAQMD's 2005 Ozone Strategy (see Impact 4.2-1), it would not result in a cumulatively considerable net increase in emissions of PM₁₀ and PM_{2.5}." Because the logic of that sentence is nonexistent, it must be deleted. Instead, the increase in emissions of PM 10 and PM_{2.5} must be found to be cumulatively considerable.

4.2-19: Because Diesel PM is a Toxic Air Contaminant, add the following to MM 4.2-4: The utilization of on-road or off-road diesel equipment for more than a de minimus amount of time triggers the requirement to implement T-BACT, the Best Available Control Technology for Toxics, which is defined as meeting the latest CARB regulations for diesel engines.

4.3-27: "As such, the proposed CTP will result in significant impacts, given the extent of projected growth throughout the county and region. As noted earlier, the majority of these impacts are directly linked to the planned growth reflected in General Plans throughout Sonoma County and would occur even in the absence of the proposed CTP." This assertion is not supported by any evidence. Because of the flawed selection of the No Project Alternative (see above) and the failure to test an representative alternative, it impossible to determine whether a CTP designed to reduce VMT would in fact have similarly significant impacts.

4.3-29: The DEIR provides no evidence to support its assertion that: "Implementation of the 2009 CTP would not directly cause increases in traffic or vehicle miles traveled." On the contrary, this letter provides expert evidence that the expansion of road capacity is correlated with increases in VMT. See *Growing Cooler*, p. 12. (attached) Furthermore, had 2035 conditions been compared to a valid No Project Alternative (see above), the increase in VMT attributable to the CTP would have been evident.

4.3-30: Impact 4.3-2 should refer twice to vehicle hours travelled--Vehicle Miles Travelled is a typo. All the above comments directed towards the discussion of VMT on the previous DEIR page are equally applicable to VHT.

4.3-32: Again, the reduction in average daily vehicle speeds is not the inevitable result of population growth--it is the inevitable result of the CTP's auto-centric growth, in which the vast bulk of transportation funding is used to make driving more convenient for single-occupant vehicles. Again, no valid conclusions can be drawn from the comparison with the No Project Alternative.

4.4-30: The analysis for Impact 4.4-7 appears mistaken. The Port Sonoma Ferry Terminal is proposed in an area surrounded by habitat restoration projects. In addition, the rest of the entire surrounding area is zoned for agriculture, and protected from urban development. Please identify precisely what plans are currently in force in that sensitive vicinity, and evaluate their consistency with a proposed ferry terminal. Please re-evaluate the other biological impact areas for this project, because the site may well be the most sensitive habitat of any project in the CTP.

4.3-33: The first sentence of Impact 4.3-4 should read "Implementation of the 2009 CTP would not directly increase PHD or PHT on the county's roadway system." All comments pertaining to VMT on page 4.3-29 apply equally to PHD and PHT. Given the projected near quadrupling of PHD, we urgently re-refer the reader to *Smart Congestion Reductions--Reevaluating The Role Of Highway Expansion For Improving Urban Transportation [aka Smart Transportation Investments]* (attached) for the reasons why chasing after congestion is a fruitless task, and why other approaches are cheaper, faster and will result in substantial GHG emissions reductions.

4.3-35: The discussion of Impact 4.3-7 includes the quote "First, the CTP does not mandate such smart growth strategies." Given the other Smart Growth policies of the CTP, and given all the evidence in reports attached to these comments, the failure to achieve the CTP's goals should result in a mitigation program that includes all feasible measures, including mandating smart growth strategies.

4.8-19: It is unclear to us whether Table 4.8-2 is accurate in regards to the Petaluma Rainier Avenue Crosstown Connector and Interchange. This area has been notorious for flooding. We suspect this project will have a significant impact by "expos[ing] people or structures to a significant risk of loss, injury, or death involving flooding." Would this project be going forward if it did not provide access to cheap land in a floodplain? Many

believe the area should never be developed, especially given a future of sea level rise. The most appropriate mitigation for this impact would be avoidance--delete the project.

4.13-11: The rate of increase in VMT in Table 4.13-3 is almost exactly equal to the rate of increase in gasoline consumption between 2008 and 2035. This indicates a stunning failure to achieve any motor vehicle fuel economies over that period. This conflicts with the statement on page 4.13-13 that "Yet, the SCTA estimates that this price increase will generally be offset by increases in future vehicle fuel economies, which are expected to increase from 19.86 miles per gallon to 32.15 miles per gallon in 2035." If those assumptions had been correctly entered into the model, gasoline consumption would have decreased, rather than increased.

4.13-13 & -14: The word "accommodate" is used in the following sentence as if the CTP is environmentally beneficial. "If these trends continue, implementation of the proposed projects in the 2009 CTP would accommodate the increased use of petroleum fuels between the current conditions and 2035." Where is the evaluation of the environmental impacts of the increased use of petroleum fuels?

4.13-14: MM 4.13-1c does not qualify as a mitigation measure. "[C]onsider[ing] investments in alternative fuel buses and rolling stock" will not result in a reduced impact. The impact will be reduced only if such investments are actually made. The measure needs to be rewritten with mandatory language.

5.0-3: The text of Section 5.2, Cumulative Air Quality Impacts, must be revised consistent with the comments on Section 4.2, above.

5.0-3: The text of Section 5.3, Cumulative Transportation and Circulation Impacts, must be revised consistent with the comments on Section 4.3, above.

5.0-21: Table 5.0-3 is inconsistent with Table 4.13-3, in that gasoline consumption should be proportional to GHG emissions. Table 5.0-3 shows a 21.6% reduction in GHG emissions, while Table 4.13-3 shows a 25% increase in gasoline consumption. These tables can't both be correct.

5.0-22: The DEIR is able to show the CTP reducing 2035 GHG emissions compared with the No Project Alternative only because it defines the No Project Alternative in such a way as to hide most of the impacts. (See above.) A legitimate analysis of the subject would reveal that the CTP's increase in road capacity significantly increases VMT and GHG emissions. (See lane-mile elasticity of 0.55 in Growing Cooler, p. 12. (attached))

5.0-23: None of the proposed Mitigation Measures on this page, or on pages 5.0-25 & -26 qualify as legitimate mitigation measures. "An EIR shall describe feasible measures which could minimize significant adverse impacts" CEQA Guidelines Section 15126.4(a)(1). The verbs "consider" "work with" and "encourage" do not create mandatory requirements and concrete commitments that would or could result in minimizing impacts. (While MM 5.0-1g contains the mandatory language "shall include"

it fails to identify what must be included. The CEQA Guidelines call for adopting a performance measure in situations where the final mitigations have not been adopted.)

Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. CEQA Guidelines Section 15126.4(a)(1)(B).

6.0-3: Alternatives 1, 2, 3, 4 and 5 explicitly state that the assumed 2035 gasoline price is \$7.47 in today's dollars, indicating the presence of a carbon tax. Was that price scenario actually intended for only the Pricing Alternative, Alternative 4, or was it intended for all the alternatives?

6.0-5: It is unnecessarily difficult to read through the project Alternatives, including the CTP, to compare their components. Please provide a matrix similar to the one contained in MTC's RTP DEIR, which used check marks to indicate which alternatives contained a particular project. This would save large amounts of paper, while making the DEIR more usable. While doing so, it would be helpful to identify the total cost of each alternative. Although Alternatives 2 and 5 are explicitly identified as fiscally unconstrained, it is not at all clear that the rest of the alternatives are constrained.

6.0-12: It is not clear what "improvements" are referred to in the Land Use and Pricing Assumptions section "Additional improvements included in this alternative are the same as Alternative 2."

6.0-38: It is not true that "It [the Alternative] shifts the focus from roadway improvements toward additional transit expansion, such as reduced headway for SMART rail service and Sonoma County Transit bus service." Vastly more dollars would be spent on roadway improvements in this Alternative. Transit expansion, while desirable, is only an add-on to an auto-centric Plan. As a result, there is little mode shift to transit.

6.0-42: It is important to not take the following finding out of context: "Taken as a whole, this alternative would potentially have more impacts on population and housing than the proposed 2009 CTP, based largely on its potential to induce growth in the urbanized areas of the county." The impacts described are experienced primarily at the political level, rather than on the environment itself. As noted below, inducement of growth near transit areas is a net environmental benefit.

6.0-51: Although the Alternatives Analysis did not calculate the percentage changes in VMT and VHT, it is interesting to note that Alternative 3 had a slightly greater percentage reduction in VHT than Alternative 4, while Alternative 4, the Pricing

Alternative, had a much greater reduction in VMT than Alternative 3, the Compact Land Use Alternative. Any hypothesis for these results? Based on this analysis demonstrating efficacy in VMT reduction, the Environmentally Superior Alternative should be a hybrid of Alternatives 3 and 4. There is no good reason not to combine them when it comes to developing policy.

6.0-51: There is no evidentiary basis for finding that increased SMART headways would create “more adverse impacts on noise” given that the basic service has a less than significant impact. (p. 4.10-19.) Inducement of growth near transit areas, when evaluating the overall environmental impacts of a project, is a significant benefit, not an impact, because of the reduction in sprawl-associated environmental impacts, including conversion of agricultural lands, habitat lands and open space to urban uses, increased air emissions, polluted run-off and increased water consumption.

6.0-52: Table 6.0-21, the summary of Alternatives Comparison, should contain the Air Quality element.

Recirculation

As a result of the disclosure of new and significant impacts, along with the correction of crucial facts and findings, such as whether the Plan achieves its GHG emissions reduction goal, a revised DEIR will need to be recirculated before it can be certified as adequate. CEQA Guidelines Section 15088.5(a).

TRANSDEF appreciates this opportunity to comment on the CTP DEIR. We urge SCTA to exhibit leadership in the area of climate change by taking the CTP past the level of business-as-usual, and show the rest of the United States what a motivated agency can accomplish. If Sonoma County becomes a national model for GHG emissions reductions, that could affect the sensitive discussions between the U.S. and China, which recently became the world’s largest emitter of GHGs. While it is difficult and scary to be a pioneer, the people of Sonoma County deserve no less. We stand ready to assist SCTA in further refining the Comprehensive Transportation Plan.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Attachments: (See next page)

Attachments:

Global Climate Change Impacts in the United States

Cost-Effective GHG Reductions through

Smart Growth & Improved Transportation Choices

Growing Cooler (Chapter 1)

Attorney General's 10/1/08 letter to MTC

Win-Win Emission Reduction Strategies

Smart Congestion Reductions--Reevaluating The Role Of Highway Expansion For

Improving Urban Transportation [aka Smart Transportation Investments]

Review of U.S. and European Regional Modeling Studies of Policies Intended to

Reduce Motorized Travel, Fuel Use, and Emissions

which are also available at:

<http://downloads.globalchange.gov/usimpacts/pdfs/climate-impacts-report.pdf>

http://www.ccap.org/docs/resources/677/CCAP%20Smart%20Growth%20-%20per%20ton%20CO2%20_June%202009_%20FINAL.pdf

<http://www.smartgrowthamerica.org/gcindex.html>

<http://ag.ca.gov/globalwarming/ceqa/comments.php>

<http://www.vtpi.org/documents/innovative.php>

<http://www.vtpi.org/documents/evaluation.php>