

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

July 3, 2017
By E-Mail to:
2017ctp@ccta.net

Brad Beck, Senior Transportation Planner
Contra Costa Transportation Authority
2999 Oak Road, Suite 100
Walnut Creek CA 94597

Re: DEIR for the 2017 Update to the Contra Costa Countywide Comprehensive Transportation Plan (SCH# 2017022054)

Dear Mr. Beck:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental nonprofit focused on reducing the impact of transportation on the climate. We submit these comments on CCTA's Draft Environmental Impact Report (DEIR) for the 2017 Update to the Contra Costa Countywide Comprehensive Transportation Plan (CTP). All page citations are to the DEIR, unless otherwise noted. We hereby incorporate our 3/12/2017 scoping comment letter by reference, as well as our colleague Peter Lydon's recent suggestions on facilitating EV charging installations.

We commented extensively on the 2014 draft CTP and DSEIR. As a result, we were appointed to the 2016 Expenditure Plan Advisory Committee, and actively participated, along with our environmental colleagues in presenting a view notably different from that of staff. TRANSDEF wrote the Voter Guide ballot arguments opposing CCTA's 2016 Measure X. We asserted the tax plan would make traffic to get worse, for reasons that will be discussed herein.

The 2014 and 2017 CTPs are similar in their fundamental approaches. While the 2017 DEIR is not "the most legally inadequate CEQA document TRANSDEF has ever seen" (2014 TRANSDEF DSEIR Comment letter), it is still nevertheless legally inadequate. It appears that CCTA has learned little from losing an election and producing an uncertifiable EIR. The agency badly needs a new strategic approach to its mission.

Introduction

The draft CTP is a great missed opportunity. Instead of looking the county's severe transportation problems squarely in the face, CCTA blinked. This CTP, overdue after the failure of Measure X, is an extended exercise in indecisive dithering about the traffic congestion that is choking mobility in the county. At the same time, the CTP offers only grudging lip service to state and regional requirements to reduced greenhouse gas (GHG) emissions.

Boiled down, Contra Costa's transportation problem is too many cars generating too many greenhouse gas emissions, and a population that will grow substantially from 2015 to 2040. The solution for the excessive growth in VMT needs to be a combined transportation and land use transition: A greater share of the public needs to live close enough to transit stops to be able to walk to them, and use transit a great deal more.

Rather than attacking the real problems, this CTP seems aimed at protecting a status quo that is satisfactory to no one. The CTP is all the more disappointing because even though current conditions are dire, this is a moment of extreme volatility, openness and potential promise in transportation planning for this part of the Bay Area.

Broad public preferences (and property values) are turning toward greater density, walkability and transit orientation. They are turning away from the traditional auto-dependent style of sprawl growth that has resulted in Contra Costa's increasing traffic congestion and higher GHG emissions. The CTP, contrarily, caters to high VMT and CO₂ pollution growth by its eagerness to support fresh growth in the sprawling eastern part of the county, now rebounding from the 2008-09 economic crash. Renewed sprawl there can only raise VMT and hours of delay, in the east and countywide.

The emergence of Uber, Lyft, and other forms of shared use may challenge the institution of privately owned cars. They will also turn the issue of parking upside down, and may well sharply bring down the basic cost of personal transportation.

Sponsorship of the GoMentum Station test track is a credit to the agency, given the potential of huge transformations that could change everything, well within the twenty-five-year planning period. These certainly include the arrival of electric vehicles and the advent of self-driving cars, trucks and buses.

While CCTA and the CTP/DEIR cannot be expected to make definitive plans in such a difficult and fluid situation, its planning documents should at least better describe the challenges and also the opportunities for improvement in the coming period.

Untimeliness of the CTP and DEIR

MTC's Guidelines for Countywide Transportation Plans, 2014, states:

CTPs serve as significant input to Plan Bay Area... (p. 2.)

The timeline for the 2014 CTP would have placed it in position to serve as CCTA's input into the 2017 RTP. However, its certification was postponed, and the plan was ultimately abandoned. As a result, CCTA was unable to submit a current CTP to MTC. Having thus missed the boat, the 2017 CTP and DEIR are improperly using obsolete data. The DEIR should have been based on the Plan Bay Area 2017 DEIR, so that it can be appropriate input for the 2021 Plan Bay Area:

MTC recommends that CTPs should evaluate transportation system performance using the most recent Plan Bay Area [RTP/SCS] **demographic and land use projections**. (*Id.*, p. 6, emphasis added.)

In order to promote the iterative relationship between CTPs and the RTP/SCS, MTC recommends that CTPs be regularly updated and adopted within 18-24 months (before or after) of adoption of the RTP/SCS. (*Id.*, p. 8.)

The law [Gov. Code § 66531] also states that CTPs should consider the latest RTP/SCS... (*Id.*, p. 2.)

The DEIR is non-compliant with these recommendations and mandates, choosing instead to base its analysis on the 2013 Plan Bay Area and not on the current one. (Note its citations are to the 2013 RTP DEIR, not the FEIR.) In addition, the DEIR should have used the 2017 Clean Air Plan and 2015 Regional GHG Inventory:

... MTC recommends that CTP outreach and regional coordination should: ... Consult the Bay Area Air Quality Management District's (BAAQMD) Clean Air Plan and its respective Transportation Control Measures (TCMs). (*Id.*, p. 3.)

The information starting on p. 2.2-4, laying out the 2007 BAAQMD Source Inventory, needs to be replaced with current information from the 2015 GHG Emissions Inventory, as reported in the 2017 Clean Air Plan.¹ The materials starting on p. 2.2-6 laying out the Plan Bay Area EIR needs to be revised with current demographic, land use and travel model projections from the 2017 RTP/SCS DEIR. The Regulatory Setting needs to be updated with recent legislation, including SB 32. After also updating the impact analyses, the DEIR needs to be recirculated.

CTP and the Plan Bay Area Performance Targets

The CTP should be evaluated according to the Plan Bay Area Performance Targets, set forth in MTC Countywide Plan Guidelines Appendix B. As the region's adopted environmental goals, they are relevant metrics for evaluation under CEQA. Decision-makers and the public need to know how the CTP did on the key measures of any transportation plan:

Increase non-auto mode share by 10% and reduce automobile vehicle miles traveled per capita by 10%. (*Id.*, p. 11.)

Flawed GHG Emissions Analysis

The EIR for the 2013 Plan Bay Area was challenged because of its flawed analysis of regional GHG emissions. That same flaw is replicated in the CTP DEIR. The following statement about state legislation can be seen to be blatantly false, given the context discussed below:

¹ Inexplicably, the DEIR cites the 2017 Clean Air Plan and updated GHG inventory, but does not replace the data on pp. 2.2-4 & 5 with their up-to-date data. (p. 2.2-8, fn 11.)

However, **consistent with State legislation**, the *Plan Bay Area EIR* projections incorporate implementation of Pavley and LCFS regulations over the life of *Plan Bay Area*. (p. 2.2-7, emphasis added in bold.)

TRANSDEF asserts that Impact Analyses GHG-2 (p. 2.2-21), GHG-4 (p. 2.2-24), and GHG-5 (p. 2.2-27) fail to comply with the legislative intent of SB 375, as expressed in these legislative findings:

...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.)

It is clear from the findings that the SCS is intended to achieve emissions reductions above and beyond the state-level measures. When the Advanced Clean Cars/Pavley and LCFS are ignored--as they must be--Table 2.2-8 (p. 2.2-22) shows a 24% increase in GHG emissions, not a 34% reduction. The following statement is flatly incorrect:

Because **implementation of the 2017 CTP** would contribute to a decrease in overall GHG emissions (from baseline condition to 2040), impacts are considered less than significant. (p. 2.2-21, emphasis added.)

This statement explicitly asserts that state-level emissions reductions are the result of the CTP. However, State-level measures are **not** part of the implementation of the CTP. They are being implemented by state-level agencies, not CCTA, and are not part of the Project Description. They are also not part of the existing conditions baseline. These state-level measures cannot be counted in evaluating local emissions, making this statement false. Please revise and recognize GHG-2 as potentially significant prior to mitigation, because the implementation of the 2017 CTP will increase direct transport-related GHG emissions by 24%.

Because a 24% increase in emissions directly impedes the attainment of goals set forth in the Executive Orders, as well as the goals of SB 32 (inexcusably missing from the DEIR's Regulatory Setting), Impact GHG-4 must be revised to be potentially significant, prior to mitigation.

Because a 24% increase in emissions directly conflicts with the explicit language of SB 375 calling for local GHG **reductions**, Impact GHG-5 must be revised to be potentially significant, prior to mitigation.

CCTA's Hail Mary Strategy

Towards the end of the EPAC process, TRANSDEF sent a letter to the Board (attached) urging it to suspend the emerging tax plan because of its failure to reduce GHG emissions. The DEIR describes the very same scenario that the letter had objected to:

Additional reductions could be achieved with a 15 percent reduction in CO2 per capita by 2050, and a 58 percent zero emissions fleet penetration. Through accelerated deployment of clean vehicles with CTP, the advanced GHG reductions trajectory, shown as the lower line on the graph, could be achieved. It is reasonable to determine that the downward trajectories shown in Figure 2.2-1 represent a reasonable expectation that Contra Costa (like the rest of the Bay Area) is more likely than not to achieve the Executive Orders' goals. (p. 2.2-25 and Figure 2.1-1, p. 26.)

CCTA learned nothing from its public involvement process. Worse yet, these "additional reductions" are provided solely to paper over the lack of compliance. They have no merit whatsoever. The DEIR showed in Table 2.2-7 (p. 2.2-20) that the CTP is unable to demonstrate **any** emissions reduction per capita. TRANSDEF was unable to identify any funding in Table 1.2-2 (p. 1.2-30) committed to achieving "a 58 percent zero emissions fleet penetration" much less a program that could conceivably achieve such an extraordinary goal. In short, the page 2.2-25 statement cited above has the same evidentiary value as the phrase "If pigs had wings, they could fly."

As we stated in our 2016 TEP letter, it would be far better to plan to achieve per capita GHG emissions reductions now and not kick the can down the road until 2040, relying on a hoped-for technological miracle.

Sea Level Rise

The purpose of a transportation plan is to optimize future transportation facilities. It is preposterous to propose to adopt a CTP that knowingly builds projects in locations subject to inundation. These problem projects cannot be mitigated at the project level. That kind of planning is the very purpose of program EIRs. The impacts must be avoided through a competent and comprehensive CTP planning process. That obviously has not occurred here. Note--the proposed Martinez and Hercules Ferry Terminals, as well as the Union Pacific rail line serving them, will also be inundated.

Transportation Analysis

The DEIR offered none of the transit service information needed to evaluate Contra Costa's Priority Development Area implementation:

PDAs are locations served by frequent transit during commute times and designated as PDAs by local jurisdictions. (p. 1.2-13.)

The DEIR must be revised to make it possible to determine which, if any, of the PDAs meets the standard for frequent transit service under the proposed Transportation Investment Program. Because PDAs are critical to the success of the region's land use strategy, and because frequent transit service is critical to the success of PDAs, the DEIR must evaluate whether adequate resources have been made available to transit.

This analysis is needed for the Alternatives as well. Based on the poor transit ridership increases over baseline for each of the Alternatives, TRANSDEF suspects that planned service levels are grossly inadequate.

Flawed Mitigation Analyses

Besides citing the wrong sub-section of the CEQA Guidelines (it should be 10591(a)(2)), the DEIR ignores CCTA's power to withhold funding as leverage to induce cooperation:

Furthermore, it is ultimately the responsibility of implementing agencies and individual project sponsors to determine and adopt mitigation. Pursuant to CEQA Guidelines section 15091(a)[3], CCTA believes that these mitigation measures can and should be adopted ... However, CCTA cannot require implementing agencies and individual project sponsors to adopt the above mitigation measures. (p. 2.2-24, 2.2-34, 3.1-87, and 3.1-91.)

While CCTA cannot require adoption of mitigation measures by grantee agencies, the identified impacts can be avoided if CCTA withholds funding to agencies unwilling to adopt the full list of mitigations, as very few projects will be able to proceed without CCTA funding.

Flawed Alternative Definitions

It is apparent from Table 3.1-37 (3.1-87) that Alternative 4, Emphasis on Transit, Bicycle and Pedestrian Programs, was designed to fail. For an alternative with allegedly no highway investment, the mere 1% shift in Drive-Alone mode share is shocking. The tiny increase in transit ridership over the CTP (~4,000) in Table 3.1-38 (p. 3.1-88) demonstrates extreme ineffectiveness in converting significant funding into new transit riders. The following reasons for this poor performance must be corrected in a revised analysis:

1. The Alternatives Analysis is heavily biased towards the status quo. The placement of Committed Projects from the 2013 RTP into each alternative prevents a fair comparison from being made between alternative strategies. Because any strategy is operating only on the margins of the multibillion dollar transportation network, the dollar weight of the Freeway and Roadway Projects of the Committed Projects overwhelms any attempt to

implement a strategy different from the status quo. The funding for all Committed Projects that have not yet entered into construction contracts must be applied to the strategy being tested by the Alternative. The Percent of Total column in Table 3.1-1 (p. 3.1-6) must be revised to indicate the percentage of total funding (including 2013 RTP funds) going to each element of the Alternative.

2. Alternative 4 is a hybrid strategy, promoting both equity and GHG reduction. As a result of its divided loyalties, Alternative 4 achieves little for either strategy. The DEIR needs at least one Alternative designed to optimally avoid or mitigate the potentially significant GHG emissions impacts discussed above. Alternative 4 puts lots of funding into youth, senior and paratransit services, which do little for GHG. These strategies/ programs should be set forth in a separate Alternative for evaluation purposes. Decision-makers can mix elements from among the various Alternatives into their final adopted CTP.

3. Table 3.1-1 (p. 3.1-6) shows that Alternative 4 is burdened with delivering \$1,680 million to local street maintenance, while the CTP gives only \$473 million. This is not a fair comparison. While it may be justifiable for Alternative 4 to fund substantially more for Transportation for Livable Communities than the CTP (that depends on the program eligibility criteria), the modeling suggests that the model is unable to recognize any mode shift or transit ridership benefit from this investment. Finally, it is unfair that Alternative 4 was made to pay \$480 million for Integrated Corridor Management, when the CTP pays only \$49 million, especially since this program has been left mostly unimplemented for years and has demonstrated little worth so far.

Flawed Alternatives Analysis

Several statements in the Alternative 4 Analysis are either completely incorrect--or demonstrate that the Project objectives are improperly biased towards the status quo:

Alternative 4 would *meet to a lesser degree* the objective to maintain the transportation system (Goal 4). This alternative would provide less support to maintain the transportation system. (p. 3.1-84, emphasis in original.)

It is unclear precisely how the word "maintain" is being used here. If it is meant merely as a surrogate for maintenance funding, arguably Alternative 4 does **more** to maintain the system. (See #3 above.) No evidence or analysis is presented to support these conclusions. It is inherent in an alternative with a strikingly different strategy that the dominance of the status quo is not being supported as much. It is unclear if that is the intended meaning, but if it is, that means this Alternative is properly fulfilling its role.

Alternative 4 would *meet to a lesser degree* the objective to continue to invest wisely to maximize the benefits of available funding (Goal 5). (*Id.*, emphasis in original.)

This conclusion ignores the sea change underway in transportation policy, in which the funding availabilities of today promote projects that **impede** the State's climate policies. New funding is becoming available for projects and programs contained in Alternative 4.

This alternative would not provide the opportunities for public/private partnerships that the Project would provide nor the extent of opportunities for leveraging given the types of projects that would be funded. (*Id.*)

There is no evidence or analysis to support these conclusions. They appear to be an unsubtle reiteration that Alternative 4 is not the status quo, which is precisely the point of an Alternatives analysis.

The analyses of Vehicle Hours of Delay and Average Speeds, p. 3.1-86, fail to recognize that numeric differences in these statistics may not be significant in terms of on-the-ground experience. The DEIR has not established that 200% worse delays are actually experienced any differently than 166% worse delays. Put another way, when delays are that bad, it's not at all clear that somewhat worse is even noticeable. Similarly, when delays are already that bad, it has not been established that a 1.8 mph difference in average speeds is even observable.

As a result of the flaws in the Alternative definition discussed above, Table 3.1-37 (p. 3.1-87) depicts a truly worthless Alternative 4. Unless the travel model was also flawed, the Alternative's failure to generate a significant mode shift indicates that the new transit service must not have been convenient enough to attract a significant ridership. It is hard to imagine getting worse results from putting this much money into transit. An effective GHG Emissions Reduction Alternative would focus transit service where it can be frequent enough and fast enough to attract choice riders. The other part of an effective Alternative is getting future land use right, so that trips generated by new residents and new employees are primarily served by transit and active modes, rather than solo driving. See the Mitigation section, below.

Note the critical absence of "**non-**":

The potential for impact related to mode shares for transit, HOV, or other non-SOV modes under Alternative 4 is considered less than significant, and would achieve greater mode share split for **single-occupant vehicles** than the Project. (p. 3.1-88, emphasis added.)

As discussed in the Flawed GHG Emissions Analysis section, the following is false:

Since overall transportation-related GHG emissions are expected to decline from the baseline condition to 2040 under Alternative 4, the impact would be less than significant. (p. 3.1-89.)

On the contrary, GHG emissions increase by 23%, and must be feasibly mitigated. The following assertion is doubly incorrect, for the same reason:

Emissions are expected to continue on a downward trajectory beyond the 2040 horizon year under Alternative 4. This assessment does not include Pavley or LCFS reductions, which are expected to contribute to greater vehicle emission reductions by 2050. (p. 3.1-91.)

The 23% GHG emissions increase represents a trend that makes the following statements clearly incorrect. It is hard to imagine a scenario in which increases of that magnitude do **not** impede achievement of the Executive Orders' GHG reduction goals, or the intent of laws like SB 375 and SB 32.

The downward trajectory represents a reasonable expectation that Contra Costa (like the rest of the Bay Area) is more likely than not to achieve the Executive Orders' goals, and that, similar to the Project, Alternative 4 is not likely to impede achievement of the GHG reduction goals of these Executive Orders. The impact would be less than significant. (*Id.*)

Alternative 4 is not expected to conflict with any applicable plan, policy or regulation adopted with the intent to reduce GHG emissions. Specifically, Alternative 4 would not conflict with the GHG reduction goals of SB 375, AB 32, or Executive Order S-3-05 and Executive Order B-16-2012. (*Id.*)

Feasible Mitigation

During the EPAC process and the Measure X campaign, TRANSDEF identified the location of future development as crucial to the future of transportation in Contra Costa County. The significant and unavoidable increases in roadway delays and GHG emissions are the direct result of the continuation of the current dispersed pattern of suburban development. The fact that 2040 Project mode share is nearly identical to the 2013 mode share indicates that new residents are projected to overwhelmingly adopt the solo driving lifestyle of current residents. That would not occur if new residents had access to convenient, fast and frequent transit, as a result of living in well-designed and well-funded Priority Development Areas (PDAs). This is a failure of planning.

TRANSDEF, working with its environmental allies in Sonoma County, put forward a proposal (attached) to turn that county's upcoming transportation sales tax into the catalyst for changing where development will take place. If successfully implemented, it would restrain the growth of VMT and roadway delays by shutting down future development in areas accessible only by automobile. The proposal would provide sales tax proceeds for local jurisdictions' road maintenance, but only for those jurisdictions willing to participate in a countywide Transfer of Development Rights (TDR) program.

The TDR program would convert buildable but unbuilt lots located away from frequent transit into unbuildable lots. Property owners would receive development rights in exchange, which can be sold to owners seeking to increase the allowable densities of lots located in PDAs and along transit routes. Jurisdictions with buildable areas near transit would agree to allow additional development with the purchase of development rights, subject to their planning process. This scheme would not change the amount of planned growth in the county, but would shift its location, thereby reducing the impacts of future growth on transportation and the environment.

Conclusion

CCTA's desire to "stay the course" results in horribly congested roadways, leading to gridlock and a lowering of the quality of life. In addition, the CTP would result in very significant increases in GHG emissions, unfairly shifting the emissions reduction burden onto other jurisdictions. The DEIR fails to contrast the consequences of continuing the status quo with meaningfully different feasible alternatives, thereby denying decision-makers the information they need to create an optimal transportation plan.

In these comments, TRANSDEF has identified numerous flaws and errors, and offered an environmentally sound alternative approach. We are willing to assist CCTA in revising the DEIR to accommodate these ideas. Because of the extensive revisions need to make the DEIR compliant with law, TRANSDEF reserves the right to comment on any and all aspects of the recirculated DEIR.

The whole point of environmental review is to assess the implications of a proposed course of action, so that a conscious evaluation can be made as to whether "Is this really the future we want?" The DEIR projects a future in which Contra Costa County is a decidedly unpleasant place to live. In TRANSDEF's view, the DEIR is more than the obligatory paperwork for a flawed process--it could serve as an excellent starting point for a serious new planning effort, to decide what changes in direction are needed to obtain a more desirable outcome.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Attachments

Sonoma Environmentalists' Sales Tax Proposal
TRANSDEF's 3/17/16 letter to CCTA Board



SCTL
TRANSDEF



May 5, 2017

David Rabbitt, Chair
Sonoma County Transportation Authority
490 Mendocino Blvd. # 206
Santa Rosa, CA 95814

Re: Measure M Extension/Renewal to Encourage Compact Growth

Dear Mr. Rabbitt:

The Sonoma County Transportation and Land Use Coalition, Sonoma County Conservation Action, TRANSDEF and Greenbelt Alliance have worked with local officials for many years to improve funding for public transportation and to encourage compact growth within our cities. We urge SCTA to make its proposal for the extension of Measure M consistent with the Sonoma County Transportation Plan's emphasis on the connections between transportation and land use, because of the adverse traffic and GHG impacts of new development.

A jurisdiction's eligibility for funds from a new sales tax should be conditioned on its adoption of planning that directs future growth into urbanized areas. The transit, car sharing, casual carpooling, biking and walking available in those area are viable alternatives to drive-alone daily travel. Any extension of the Measure M sales tax needs to greatly reduce the growth in traffic due to new development. The ballot measure would contain provisions to accomplish the following:

- Set countywide standards for allowable growth in future Vehicle Miles Travelled (VMT).
- Provide road maintenance tax money only to jurisdictions that meet the VMT growth standard. This would incentivize a shift in the planning for future growth, moving it away from greenfields and into already urbanized areas, especially Priority Development Areas--walkable communities that enable reduced solo driving.
- Encourage development of Priority Development Areas through a designated funding program.
- Provide enough transit operating funds to enable the operation of a robust transit network linking the County's Priority Development Areas.
- Fund an office to coordinate the Transfer of Development Rights from greenfield areas to Priority Development Areas.

Sonoma County's Priority Development Areas (PDAs), already worked out with MTC/ABAG in Plan Bay Area, represent an important step forward in Growth Management. It is important to invest adequately in the development of the PDAs to help them attract most of Sonoma County's expected new residents in the coming 20 years. Because Transit-Oriented Development represents a change in the thinking of many developers, incentives may be needed to stimulate the creation of more such communities.

Among their benefits, PDAs tend to relieve development pressures on valuable open space. The SCTA should focus on the development and upkeep of the rail and bus transit needed to make PDAs work. Santa Rosa already has a vision for frequent bus service on major arterials.

It is particularly important to encourage the strongest form of PDA, where housing and economic activity for a wide middle-income spectrum of the population are grouped within easy and attractive walking/biking distance of high-frequency bus stops and neighborhood retail. SMART has already departed from reliance on the large parking lots around transit stations that add to pollution.

Planning for future growth around high-quality transit will avoid further burdening existing roadways. The sales tax needs to incorporate a Growth Management Plan that includes explicit disincentives for development that further increases VMT. The county should work to exceed its greenhouse gas reduction goals; major gains could come from programs that speed conversion to battery electric vehicles.

Congestion is the result of too many cars driven by solo drivers. Reliance on intelligent highways and self-driven vehicles would simply encourage more solo driving, making congestion worse, not better. A more effective answer is smartphone-based real-time ride-matching, in which travel time savings in HOV lanes incentivize drivers to share their cars with a passenger.

With the arrival of SMART, Sonoma County should direct funding toward making *itself* an integral part of a vibrant metropolitan region, where excellent public transit is the preferred way to travel. We understand that expanding roadway capacity to meet demand does not increase mobility in the long-term, because that capacity soon fills up. It worsens the climate impacts of transportation, which is contrary to state policy. We can follow the forward-looking thinking of the Los Angeles City Council in adopting Mobility Plan 2035, to encourage alternatives to driving alone.¹

¹ The Plan recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, through reduction of vehicle trips, and through focusing growth in proximity to public transit.
<https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>

If you have questions or wish to discuss our suggestions further, please contact Steve Birdlebough at 707-576-6632 or scbaffirm@gmail.com. Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink that reads "Willard Richards". The signature is written in a cursive style with a large, prominent initial "W".

Willard Richards, Chair,
SCTLC

A handwritten signature in black ink that reads "Michael Allen". The signature is written in a cursive style with a large, prominent initial "M".

Michael Allen, Chair
SCCA

A handwritten signature in black ink that reads "Teri Shore". The signature is written in a cursive style with a large, prominent initial "T".

Teri Shore, North Bay Regional Director
Greenbelt Alliance

A handwritten signature in blue ink that reads "David Schonbrunn". The signature is written in a cursive style with a large, prominent initial "D".

David Schonbrunn, President
TRANSDEF

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

March 17, 2016
By E-Mail to
Rlwasaki@ccta.net

Dave Hudson, Chair
Contra Costa Transportation Authority
2999 Oak Road, Suite 100
Walnut Creek, CA 94597

Re: Performance and Equity Evaluation of the Draft Transportation Expenditure Plan

Dear Chair Hudson and Board Members:

The Transportation Solutions Defense and Education Fund ("TRANSDEF") is a non-profit environmental group advocating for the regional perspective in the planning of transportation, land use and air quality. In the past few years, we have focused on reducing the impacts of transportation on climate change. We have participated in the EPAC because we recognize that Contra Costa County's transportation planning process is an important test case of whether a suburban county can transform itself in response to the dual challenges of catastrophic climate change and impending gridlock.

We wanted you to be aware of several inescapable conclusions from the Performance and Equity Evaluation of the Draft Transportation Expenditure Plan ("Evaluation"), before expending further time and effort on a sales tax plan.

First, your Board previously declared that it wanted a "transformative" tax plan. Table 3 on page 11 of the Evaluation offers conclusive proof that the Draft TEP is not a transformative plan. Neither of the alternatives produces any meaningful change from the conditions projected for 2040 without a sales tax.

Second, your two alternatives are similar enough in effect as to be indistinguishable. The differences fall within the travel demand model's margin of error. The purpose of alternatives is to give policymakers an understanding of the available range of options. These alternatives do not do that.

Third, your alternatives result in a substantial **increase** in GHG emissions, due to an increasing population and a stable VMT per capita. See the upper curve in Figure 1 on page 18 of the Evaluation. The legislative intent of SB 375 recognized that statewide measures alone were insufficient to achieve the 2050 target. It required local changes in transportation and land use patterns in order to **reduce** future local GHG emissions.

As can clearly be seen in Figure 1, the local increase prevents the combined statewide and local efforts from being on track to reach the 2050 target. It misses significantly. Staff calculated that closing that gap would require a last-minute 15% reduction in VMT/capita plus a 58% conversion of the fleet to electric vehicles. Given that information, it would be irresponsible to continue working on the draft TEP.

We note a striking disconnect between the 28% increase in population projected in Table 1 and the following statement:

At present, we do not know what specific strategies MTC will consider to meet the Governor's targets, but we do know that achieving the 80 percent [reduction] goal will require substantial increases in the share of zero emission vehicles as well as **additional reductions in VMT**. (pages 4-5.)

Table 7 shows Contra Costa producing a 28% increase in GHGs, resulting from a population growth-driven **increase in VMT**. Is CCTA actually expecting the other counties of the region to provide all the VMT reductions? That would be grossly unfair to the other counties of the region and state, exposing CCTA to legal challenge.

TRANSDEF cannot support a sales tax that would lock in an expenditure plan for decades that ignores the County's responsibilities to reduce climate emissions from its vehicular travel. It would be far less disruptive to implement a small VMT per capita reduction over several decades--to prevent population growth from increasing the total emissions--than to suddenly jam on the brakes in 2040.

Our message to your Board is that it is simply not possible to transplant the priorities and wish lists of the past into the present environment. It requires entirely new thinking. While we believe your staff understands this, they are operating under direction from your Board to proceed with, essentially, a rework of past plans. This approach is bound to fail, either at the polls or in the courts.

We urge you to shut down the TEP process and start intensive work on a Countywide Transportation Plan and DEIR. (Please note that we intentionally did not say DSEIR.) A great deal of thought, analysis, education and discussion will be needed before a truly transformative plan can achieve public support. We stand ready to assist in the transition to a more sustainable transportation system.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President