

Omar (& Dana),

I wish to submit the following comments regarding the Draft Climate Action Plan. A written response to each point (email is fine) is greatly appreciated.

(1) There should be a chart identifying the CO2 emissions per passenger mile of different transport modes over the coming years. This should be based on EMFAC data and transit ridership data. This chart is important to illustrate the emissions per passenger mile of different transportation modes, and precisely how CARB anticipates these changing:

- ferries (which we know are large emitters)
- train (there are no ridership figures, the Dowling figures are disputed, so this should be based on similar trains or the US national average ridership for commuter trains). This should use SMART's published CO2 emissions.
- buses.

NO SUCH CHART IS PRESENT IN THE AUG 2014 DRAFT. SPECIFIC EMISSIONS RATES ARE NOT CALLED OUT

This appears to obfuscate information critical to understanding emissions rates of different forms of transportation - deferring and delegating to CARB EMFAC in order to mask clarifying critical insight. Further there is no reference to enacted Pavley II, only Pavley I (unless this is the "Advanced clean cars (ACC)" rule?

Consequently this means that a lay person reading the report may be led to otherwise illogical conclusions regarding encouragement of transit use will reduce emissions.

(2) There should be a clear acknowledgement that driving more people to use buses will result in an increase in bus emissions per passenger mile. This is because the most used arterial routes are already served, and increased ridership will be spread over less used routes (diminishing returns).

NOT ONLY IS THIS NOT REFERENCED, THE PLAN STATES THE FOLLOWING WHICH WILL SERVE TO INCREASE EMISSIONS (page 203) "Expand local and regional bus service in range and/or frequency where service expansion would result in higher bus occupancy and would result in lower GHG emissions per passenger mile than for average passenger vehicles. "

While expanding bus frequency may increase overall ridership, since the most highly popular arterials are already served such a policy is GUARANTEED TO INCREASE EMISSIONS. The additional routes will be less popular and serve to reduce average ridership. This will in turn increase emissions per passenger mile vs. alternative methods - e.g. passenger cars which are already lower in emissions than Golden Gate

Transit buses based on actual reported ridership by GG Transit and EMFAC emissions data.

(3) There is emphasis on increasing more transit usage within the county. If this is buses then it should be noted that emissions (due to low ridership) are especially low.

See above point. The policy is back to front and will serve to increase emissions both on a per passenger mile basis and on an overall basis.

(4) It should be noted that SMART's emissions per passenger mile will shortly be eclipsed by passenger cars. Therefore policy should not seek to switch passengers to the train, bus or transit which generate higher emissions
NO SUCH REFERENCE IS INCORPORATED, THE INPUT IS CLEARLY IGNORED. This leads to a clear misrepresentation.

(5) There should be a clear acknowledgement that transit should first and foremost solve for mobility (e.g. reducing congestion, getting people - especially those on lower incomes - to where they need to go quickly and with the minimum of mode changes).

NO SUCH REFERENCE IS INCORPORATED, THE INPUT IS CLEARLY IGNORED. This leads to a clear misrepresentation.

(6) There should be a chart showing transit usage per capita for the region and comparing this to transit investment per capita. Such a chart will show that despite increased investment, per capita transit usage has dropped. Any suggestion that this trend will reverse (which is currently implied by the CAP) should be thoroughly explained and all assumptions provided.

THIS VITAL CONTEXT IS ALSO COMPLETELY OMITTED, the plan makes assumptions that ridership trends will somehow reverse without providing a clear explanation of why or how this will occur.

(7) There should be clear identification of the impact of increased investment in bike paths has had in bike ridership. A significant recommendation appears to be that a shift from cars to bikes can be accomplished. According to data from the recent Congressional Report despite investment of \$28m in bike paths in Marin ridership has declined (analysis should NOT use moving averages, or apply upward trends in bike path usage that occurred prior to bike path implementation).

Reference including links and detailed citations:

<http://www.planningforreality.org/walkbikemarin-20m-failure/>

THIS IS ALSO OMITTED. Furthermore the latest data from the Non-Motorized Transportation Program congressional report showing a decline in bike usage is omitted, while obsolete data on page 227 suggests that bike usage will somehow increase by +2%. There is a lack of context that

the number of bike trips for commute purposes (not leisure) is very low indeed, and since significant amount of bike riding is pleasure trips this likely does not represent any genuine vehicle miles travelled reduction.

(8) Marin's current CO2 emissions as a % global CO2 emissions and as a %US emissions should be clarified for perspective.

THIS VITAL CONTEXT IS OMITTED

Marin's residents are being expected to make sacrifices likely to have an infinitesimally small effect on overall climate change.

(9) Marin's contribution to reducing CO2 emissions versus other counties in California should be published.

AGAIN THIS VITAL CONTEXT IS OMITTED

(10) The CAP should reference and clearly state the impact of planned growth in adjacent counties and its impact on traffic congestion on highway 101. It should reference that Sonoma County has 24,010 additional housing units planned for Priority Development Areas. Each unit representing ~3 additional people and 6.72 daily car trips - some of which will be on highway 101. Any assumptions around these new residents using the SMART train should be clearly identified and reconciled with SMART's limited connectivity to major employment centers.

References:

<http://www.planningforreality.org/smart-pda-growth/>

http://www.sctainfo.org/reports/Sonoma_County_Priority_Development_Area_Investment_and_Growth_Strategy_Short_Term_Report/Sonoma_County_Priority_Development_Area_Investment_and_Growth_Strategy_Short_Term_Report.pdf

THERE IS ABSOLUTELY NO REFERENCE TO IMPACT OF GROWTH IN ADJACENT COUNTIES

This omission is very significant. The pressure being placed on highway 101 by growth in Sonoma County (24,010 units in PDAs there) is likely to create significant additional congestion and omissions, yet is not even mentioned.

(11) The CAP advocates transit oriented development that is dependent on the ability to add substantial housing development to the county. The CAP should reasonably identify the capacity of Marin County to support such additional housing based on:

- realistic understanding of the capacity of water supply, and that exceeding capacity is likely to require desalinization plants that would be major emitters of CO2

- realistic understanding of the capacity of highway 101 given expansion already planned by Sonoma County

A limited explanation of water provision is provided. It is unclear if this is sufficient.

(12) There should be clear acknowledgement that the presence of the train is likely to diminish and otherwise encroach on funding for other more cost-effective modes of transportation. It should be clarified that the trains presence is highly likely based on case studies in Southern California and New York City to increase transit fares for the region, decreasing transit ridership. Detailed references with figures and citations here:

<http://www.planningforreality.org/rail-the-transportation-cannibal/>

This is completely omitted. We appear to be completely ignoring patterns and history lessons and repeating prior failures.

(13) the notion of "establishing city centered corridors" should be clarified. It should be noted that many residents do not support expanding the urbanization of the county, except for in already urbanized downtown San Rafael.

This is not clarified, yet "city center corridors" are referenced 3 times.

(14) The notion of reducing vehicle miles travelled by locating housing near jobs should be either struck, and/or references made to the following peer reviewed paper that identifies multiple reasons why VMT does not drop when building new housing near transit:

<http://www.uctc.net/papers/133.pdf>

- work location is one of many factors in deciding on housing location
- often people prefer to live near friends, relatives
- people will commute further to live in a larger house / more desirable location
- often households contain workers with multiple jobs
- frequency of job change is increasing. One may move close to ones current job only to change jobs
- people will commute further to get to higher paying jobs

This comment is completely ignored / disregarded.

(15) The photo on page 59 of a packed bike path implies that this is a significant way in which emissions can be reduced. It is not. Please remove this misleading picture.

The bike path photo still appears on page 59. Please remove it.

(16) page 69 talks about transportation demand management programs, it should be clarified in laymans English precisely what this means. If this imposes parking fees, and these fees may increase costs for those on lower incomes, then this should be clarified.

This is the one item that does appear to be addressed on page 200.

(17) All references to "multi-modal transit" should be removed. This is a vague statement. It spans a variety of transit modes - especially transit modes that may

include ferries, buses and trains, but not cars - where emissions exceed transit modes not considered "multi-modal".

"Multi-modal" is referenced on page 69, "multimodal" on page 235.

Also use of the term "multi-modal" is misleading as it can imply that bike commuting is a potential solution when investments of \$28m+ by the county have proven over an extended period that this has either no effect, or may actually result in a reduction in bike commuting. Again it is strongly suggested that this misleading term is removed.

Correction - the county/state/fed has invested \$138m according to Marin County Bicycle Coalition yet bike counts are dropping. See above point about bike counts being misrepresented as rising.

Many thanks. Your written (email or letter) acknowledgement of each item in the above list of 17 items identifying changes to the CAP is appreciated. If no change is made pointers to evidence to the contrary is welcomed.

Many thanks,

Richard Hall
San Rafael

This [draft plan](#) does not [yet] represent my input. It appears to selectively use data, and through omission and erroneous representation progress a plan that does not maximize our emissions reductions, while placing potentially onerous solutions such as high density housing near transit, imposing acute traffic and parking and quality of life issues for Marin's residents.

Richard

Dana,

On August 26th I submitted the following explicit comments to the County of Marin regarding the climate action plan. Here is my review of which of these comments are now [present in the resulting plan](#). I am not seeing few if ANY of the very important points that I have made incorporated into the Climate Action Plan. This leads me to ask the question of whether the input process was fair or if there is a pre-ordained outcome, and specific facts are intentionally being masked or omitted.

There is a significant error on page 203 advocating expanding transit service, particularly buses, will reduce emissions when this will clearly achieve the opposite (see explanation below) and serve to **increase emissions**.

Most of all I am concerned by Trans 1-1 on page 197, "**Promote Mixed Use, Infill, and Transit-Oriented Developments**" which states the following, an approach which many constituents disagree with:

The County would promote longstanding Countywide Plan growth control strategy of focusing new development in the city center corridor via mixed-use, infill, and transit-oriented developments in downtown neighborhoods, transit-hubs, and transit corridors for the unincorporated County. "

This claims that such an approach will reduce vehicle miles travelled by 9-30% when in fact it will add many new vehicles to our roads and exacerbate congestion, further increasing emissions.

Further impact comes in Trans 1-3 which advocates reduced parking for housing projects (causing spillage onto existing streets), "unbundled parking costs",

It would seem significant sacrifices are being asked of residents. In particular the infill development above will have impact on health, concentrate traffic in existing congested areas and affect parking.

Richard