



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**

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February 2, 2009

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Re: OPR Preliminary Draft CEQA Guideline Amendments for GHG Emissions

Dear Ms. Roberts:

Thank you for the opportunity to provide comments on the Office of Planning and Research Preliminary Draft CEQA Guideline Amendment for Greenhouse Gas (GHG) Emissions (January 8, 2009). The State of California is leading the nation as we seek to reduce GHG emissions to 1990 levels by 2020, and move towards greater reductions of 80 percent below 1990 levels by 2050. This is an enormous challenge, and will require a tremendous amount of work, innovation, new and creative partnerships, as well as lifestyle changes. The San Francisco Bay Area Rapid Transit District (BART) believes that transit is vital to reducing greenhouse gas (GHG) emissions, while at the same time providing Californians with more travel choices, expanding our economy, reducing our energy dependence, and fostering more compact and livable regions.

We are submitting the following comments on Appendix G (initial study checklist) for your consideration:

1. **Greenhouse Gas Emission (VII, p. 7).** Please clarify whether proposed Guideline VII(a) refers to "net" GHG emission. This point is significant because BART trains run on electricity, and 2/3rds of our current power mix is generated by hydro-electric sources. Nevertheless, there are GHG emissions (scope 2) to provide BART service. However, if you compare these to the GHG emissions reductions from auto trips displaced by patrons choosing to ride BART (and by enabling land use patterns which encourage fewer overall auto trips), BART provides a "net" reduction in GHG emissions for the transportation sector.
2. **Transportation / Traffic (XVI, pp. 10-11).** The proposed analysis framework (a and b), focusing on vehicle trips and vehicles miles traveled is better suited for

evaluating the environmental impacts of a project as compared to intersection level of service (LOS), especially as it relates to air quality, GHG and public health. In addition, the suggested removal of (f) adequacy of parking capacity from the checklist requirement is also better aligned with the evaluation of these same environmental factors. These changes also better support transit-oriented development (TOD) and reductions in GHG from mobile sources. We support the proposed changes.

3. **SB375 – Regional Targets.** The Guidelines need to account for regional GHG reductions resulting from re-directed growth, consistent with policy direction coming out of SB375 and the California Air Resources Board (CARB's) adopted Scoping Plan. It is important to achieve significant GHG reductions at the highest geographic / political scale possible. At the regional scale, or when evaluating *per capita* emissions, it is very important to achieve higher intensity of use near transit which typically have lower vehicle miles traveled (VMT) and GHG emissions than similar projects located elsewhere in a region, but away from transit. For example, at the transit-oriented development (TOD) project-level, a higher-intensity project will have higher GHG emissions than a lower-intensity project at the same location. The TOD project would achieve lower *per capita* emissions as compared to the regional average. The Guidelines need to address this scale issue.

Thank you again for considering these comments. If you have any questions, please contact me at 510.287.4794 or by email at [VMenott@bart.gov](mailto:VMenott@bart.gov).

Best Regards,



Val Menotti  
Deputy Planning Manager - Stations