



June 14, 2021

San Rafael Planning Commission
14 Fifth Avenue
San Rafael, CA 94901

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**RE: Comments on Final Environmental Impact Report for
General Plan 2040 and Downtown Precise Plan**

Honorable Commissioners,

We appreciate the strengthening of key General Plan 2040 greenhouse gas (GHG) reduction programs in response to our 3/9/21 comments on the Draft EIR. Although we disagree with the rationales given by the EIR consultants for their conclusions regarding GHG reductions by 2040, we do understand them.

However, the fact that the Final EIR continues to find the greenhouse gas (GHG) impacts of General Plan 2040 to be “significant and unavoidable” raises a major red flag that San Rafael must redouble its efforts to reduce climate change.

The FEIR projects a 20% reduction of GHG by 2040, while stating that a 60% reduction by then would be required to meet state law (table 4.5-5). Contrary to the report’s suggestion, these GHG impacts are not unavoidable. The technologies needed to reach 60% local emission reductions are readily available and affordable in all the emission sectors that the FEIR lists.

By implementing low-emission building electrification, transportation, and organic waste programs early this decade, the City can and must achieve the targeted 60% reduction of GHG over the 20-year term of the Plan, for both existing and new development, placing San Rafael on a solid trajectory toward carbon neutral. The attached calculations show one scenario.

What’s needed is the City’s firm commitment to implement GHG solutions it has already identified. To that end, we request the following addition to Section 6 (or elsewhere) of the FEIR Certification Resolution, and subsequent related resolutions:

‘d) That notwithstanding any finding of overriding consideration relative to GHG reductions, the City shall continue to vigorously implement all programs it considers necessary to achieve or exceed State GHG goals, including actions pursuant to its 2021-22 Climate Change Action Plan priorities to reduce emissions through building electrification, electric vehicle adoption, and mandatory organics recycling, thereby addressing the three largest sectors of San Rafael’s GHG footprint in the timeframe needed to meet such goals.’

With such a commitment, we continue to support General Plan 2040 as a viable blueprint for a sustainable future.

Sincerely,
William Carney, President

SSR Calculations for General Plan 2040 GHG Mitigations

6/12/21 BC

<i>Program</i>	<i>2019 MTCO_{2e} per DEIR</i>	<i>% decrease by 2040</i>	<i>Amt. decrease by 2040</i>	<i>Notes (all programs required to start by 2025)</i>
Building electrification	73,666	50%	36,833	Revised C-4.1D reduce natural gas requirement
Fossil free electricity	74,731	80%	59,785	Revised C-4.1D clean electricity requirement*
Car electrification	422,162	60%	253,297	Revised M-3.6A ZEV Plan implementation
Organics recycling	22,801	75%	<u>17,101</u>	Revised CSI-4.17E SB1383 organics compliance
TOTAL DECREASE:			367,016	* MCE to reach 95% fossil free by 2023
Target amount (60%):			360,000	(598,529 tons x 60% = 359,117 tons)