



June 28, 2021

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

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**RE: General Plan 2040, Downtown Precise Plan/Form-based Code, and Environmental Quality Act Findings**

Honorable Commissioners,

General Plan 2040 and the Downtown Precise Plan create a solid foundation for a sustainable future in San Rafael, supporting environmental, economic and equity goals. This foundation has been strengthened through the environmental review process.

We are especially gratified that the recommended plans and environmental documents both now include effective policies and actions to address the climate change that will continue to affect us with increasing intensity over the next twenty years – and that must be mitigated within this timeframe.

These policies, programs and commitments include:

1. Concentrating housing and commercial development near transit, in walkable, bike-friendly town centers.
2. Achieving significant reductions of greenhouse gas emissions by rapid implementation of the programs in General Plan 2040 and Climate Change Action Plan 2030, especially those that target the primary sectors driving emissions, including:
  - a. *Building electrification.*
  - b. *EV infrastructure, promotion, and adoption.*
  - c. *Mandatory organics recycling.*
3. Moving quickly to adopt and codify these GHG programs, in accordance with the 2021-2022 priorities of CCAP 2030, so that the large reductions required can be achieved during the term of the Plans, with new development and renovations contributing to the reduction of GHGs rather than their growth.
4. Closely monitoring GHG reductions in order to adjust, strengthen, and expand CCAP programs as needed to meet City and State emission goals.

With these steps firmly in place and proactively applied to both existing and anticipated development, we believe that the significant GHG impacts predicted by the General Plan 2040 EIR can be avoided. The EIR 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). However, CCAP 2030

already provides viable ways to attain a 40% reduction in the next ten years. Sustainable San Rafael calculations (6/14/21) indicate that the remaining 20% needed to reach the full 60% reduction by 2040 (a total reduction of 360,000 MTCO<sub>2e</sub> from current levels) can be accomplished by early adoption and diligent application of low-emission building electrification, mobility, and organic waste programs already identified.

Additional actions and approaches will no doubt enhance these efforts, but the technologies needed to reach 60% emission reductions locally are readily available and affordable, from EVs, to heat-pump HVAC, to Marin Sanitary green carts. Even the long-sought 'political will' to engage climate change is growing with each new wildfire, drought, flood, and heat wave. What's needed now are the leadership, laws, and incentives to integrate these practical solutions into the fabric of our community.

We remain disappointed that the EIR did not include these and similar solutions as mitigations to the greenhouse gas impacts it identifies. Nonetheless, the fact that the EIR continues to find the GHG impacts of General Plan 2040 to be "significant and unavoidable" raises a bright red flag spurring San Rafael to meet its climate goals and thereby prove those predictions wrong.

Accordingly, we urge the Planning Commission, and the City as a whole, to carefully weigh the GHG impacts of every action that comes before you pursuant to these Plans, and to reduce those impacts to retain our city's trajectory to net-zero emissions.

General Plan 2040 and the Downtown Plan/Form-based Code provide a comprehensive framework for such considerations, and Sustainable San Rafael supports their adoption. In applying them going forward, we ask that you bear in mind that the 20-year term of the new General Plan coincides with what many scientists consider the final two decades left to cut greenhouse gas emissions sufficiently to avoid irreversible tipping points that would move climate change beyond human control.

Sincerely,

William Carney  
President

*Copies:*

City Council, Jim Schutz, Barry Miller, Cory Bytof