



February 16, 2011

Stephanie Williams, AICP, Senior Planner
City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94041

Dear Ms. Williams:

Greenbelt Alliance appreciates the opportunity to comment on the Notice of Preparation for the EIR for the Mountain View General Plan 2030. For over 50 years Greenbelt Alliance has been the Bay Area's advocate for open spaces and vibrant places. We have four main recommendations for the City as it prepares the General Plan EIR, all of which are described in more detail below:

- 1. Analyze the projected greenhouse gas emissions and vehicle miles traveled from both the plan itself and cumulative impacts.**
- 2. Ensure that the analysis compares apples to apples within the broader regional context, taking into account the environmental impacts of where growth would *otherwise* occur if it does not happen in Mountain View.**
- 3. Propose mitigations to reduce projected emissions, including planning for more homes for workers at all income levels, increasing density near transit, decreasing parking, and specifying minimum densities and floor area ratios.**
- 4. Analyze at least one alternative that includes increased residential development totals and higher densities than the preferred plan.**

Background

The state of California has taken a leadership role with respect to climate change. AB32, the Global Warming Solutions Act of 2006, mandates that the state's greenhouse gas emissions be reduced to 1990 levels by the year 2020. The Governor has also issued an Executive Order (S-3-05) calling for reduction of greenhouse gas emissions to 80% below 1990 levels by 2050. In 2008, California passed SB375, which requires that Regional Transportation Plans include a "Sustainable Communities Strategy" to meet GHG reduction targets from vehicle travel as set by the California

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Air Resources Board. Because land-use decisions are made at the local level, individual cities must play a significant role in reaching the region's SB375 targets.

California's Attorney General Jerry Brown has stated that where General Plans have global warming impacts, the California Environmental Quality Act requires that the plans include alternatives or mitigation measures to reduce the effects of climate change, and those measures should be mandatory rather than discretionary whenever feasible.

The Attorney General's comments have focused on the land-use and transportation sectors for several reasons. Local government is the only level of government that has authority over land-use changes; cities and counties can and must play a critical role in meeting state's AB32 and SB375 goals. In addition, land-use changes are by far the most significant contribution local governments can make to address climate change; in most California cities, transportation accounts for over 50 percent of the city's carbon emissions, whereas the waste sector and city vehicle fleet account for less than five percent. Furthermore, land-use decisions provide lasting, long term impact to the built environment. Poor choices today lock in unsustainable practices for generations.

Recommendation 1: Analyze the projected greenhouse gas emissions and vehicle miles traveled from both the plan itself and cumulative impacts.

This analysis should include the greenhouse gas impacts of at least the following variables in each alternative:

- Jobs/housing ratio
- Residential densities and commercial floor area ratios
- Mix of uses (in the project/plan and in the surrounding area)
- Levels of housing affordability
- Proximity to transit
- Bicycle and pedestrian amenities
- Decreased parking requirements

Recommendation 2: Ensure that the analysis compares apples to apples within the broader regional context, taking into account the environmental impacts of where growth would *otherwise* occur if it does not happen in Mountain View.

On the surface, it may look like adding more office space, shops, and homes in Mountain View will by definition increase the city's greenhouse gas emissions and VMT, and that an alternative with less development will be better for the climate. However, greenhouse gas emissions are not bounded by the city limits. As the city calculates the emissions and VMT impacts of different General Plan land

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use scenarios, it is essential to compare apples to apples within the broader regional context. The city must model where growth would *otherwise* occur if it does not happen in Mountain View.

For example, if Alternative 1 plans for 8,000 new homes in Mountain View and Alternative 2 plans for 12,000 new homes in Mountain View, it is essential to consider where the 4,000 homes not built in Mountain View under Alternative 2 will otherwise be built, and the impact on emissions. As an example, if the shortfall of 4,000 homes were built in San Jose, Livermore, and Gilroy, Alternative 1 would produce approximately 16% more greenhouse gas emissions than Alternative 2, due to more people living outside of Mountain View and commuting in.

Recommendation 3: Propose mitigations to reduce projected emissions, including planning for more homes for workers at all income levels, increasing density near transit, decreasing parking, and specifying minimum densities and floor area ratios.

The document *Model Policies for Greenhouse Gas Emissions in General Plans*¹ from the California Air Pollution Control Officers Association (CAPCOA) includes specific language for General Plan policies that can serve as mitigations for climate change impacts.

Recommendation 4: Analyze at least one alternative that includes increased residential development totals and higher densities than the preferred plan.

CEQA requires lead agencies to conduct analysis of alternatives that may be environmentally preferable. With respect to climate change, the document *Climate Change, the California Environmental Quality Act, and General Plan Updates: Straightforward Answers to Some Frequently Asked Questions*² from the Attorney General's office states:

A city or county should, if feasible, evaluate at least one alternative that would ensure that the community contributes to a lower-carbon future. Such an alternative might include one or more of the following options:

- **higher density development** that focuses growth within existing urban areas;
- policies and programs to facilitate and increase biking, walking, and public transportation and reduce vehicle miles traveled;
- the creation of “complete neighborhoods” where local services, schools, and parks are within walking distance of residences;

¹ <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-09-915am.pdf>

² http://ag.ca.gov/globalwarming/pdf/CEQA_GP_FAQs.pdf

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- incentives for mixed-use development

In addition, the Attorney General's comment letter on the City of Pleasanton's General Plan DEIR³ references the need to study alternatives that increase residential development to improve the jobs/housing balance:

The DEIR examines only three alternatives to the proposed General Plan Update, none of which consider significantly reducing business development or **significantly increasing residential development**. CEQA requires a local agency to identify and study a reasonable range of alternatives that would attain most of the basic objectives of the project. The fundamental purpose of alternatives analysis is to examine alternatives that can eliminate or reduce significant environmental impacts. An EIR must meaningfully compare the alternatives as they contribute to global warming and an EIR should compare the alternatives' greenhouse gas emissions. Further, the differences in greenhouse gas emissions associated with the various alternatives should figure into the lead agency's identification of the "environmentally superior alternative."

The EIR for the Mountain View General Plan should analyze at least one alternative that includes increased residential development totals and higher densities than the preferred plan.

Sincerely,

Stephanie Reyes

Stephanie Reyes, Policy Director

CC:

Mountain View City Councilmembers
Mountain View Environmental Planning Commissioners
Martin Alkire, Principal Planner
Kevin Duggan, City Manager
Randal Tsuda, Community Development Director

³ http://ag.ca.gov/globalwarming/pdf/comments_Pleasanton_GP.pdf

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