



March 20, 2008

Ashley Nguyen, EIR Project Manager.
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: Comments on the Scope of the Transportation 2035 Plan EIR

Dear Ms. Nguyen:

Greenbelt Alliance is the Bay Area's advocate for open spaces and vibrant places since 1958. We appreciate this opportunity to comment on the scope of the environmental analysis for the Transportation 2035 Plan.

We applaud MTC for taking a "Three E's" approach to the Transportation 2035 Plan, and for setting specific goals and performance objectives for each of the "Three E's." Only by establishing objectives and measuring progress toward our goals can we hope to achieve our shared vision for a more efficient, equitable, and environmentally sustainable region. Accordingly, **we ask that the EIR rigorously analyze the effects of the alternatives on MTC's performance objectives, including greenhouse gas reduction.**

As MTC's models clearly show, it is impossible to meet our "Three E's" targets through infrastructure investment alone. Land-use strategies must play a key role in achieving our goals. For this reason **we ask that the EIR study an alternative that includes significantly more focused growth**, such as higher density development scenarios created by ABAG.

With the development of the Air Resources Board's Scoping Plan for AB32 implementation, it is possible that options for pursuing regional goals and objectives that were not previously available may become available in the near future. These could include implementing an Indirect Source Rule review on new development, authority to reject development proposals that exceed a given greenhouse gas emission threshold, or authority to levy new fees and taxes to provide increased funding to land-use programs. Greenbelt Alliance urges MTC to include all options for meeting our regional goals and study bold alternatives in the EIR.

Sincerely,

Stephanie Reyes, Senior Policy Advocate

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