Rick Longinotti, Co-chair

June 4, 2018

California Air Resources Board
California Transportation Commission

Dear Board Members and Commissioners,

I'm writing to call your attention to a serious defect in the implementation of SB 375. Secondly, I want to tell you about a step taken by the Association of Monterey Bay Area Governments (AMBAG) to reduce vehicle miles traveled. The AMBAG step should be emulated statewide.

In the case of one region, and probably many more, the requirement of SB 375 that regional Metropolitan Transportation Plans and Sustainable Communities Strategies (MTP/SCS) achieve a reduction in greenhouse gases is not being met. The MTP/SCS prepared by AMBAG for adoption at their June 13th meeting has a negligible effect on reducing GHG's. According to the EIR on the plan, GHG emissions in 2040 will be just 0.3% lower with the MTP/SCS than with the No Build Alternative.[1] This is certainly not the intent of SB 375.

Nevertheless, the AMBAG region meets the requirements of SB 375 because under both the Plan and the No Build Alternative, GHG emissions from transportation are estimated to drop 22% by 2040 from the 2015 baseline. The calculation of these emissions reductions are not supposed to include statewide measures such as fuel efficiency mandates. Accordingly, the Final EIR reports that, "per capita GHG emissions presented in the Draft EIR did not factor in State programs that improve vehicle emission standards, changes in fuel composition, or other State measures that reduce GHG emissions".

This begs the question. How can VMT go up by 24%[2], yet GHG's from transportation go down by 22%? The Final EIR offers no explanation other than describing how the modeling of GHG emissions works.

Without an explanation that makes sense in the real world, it is difficult to trust the methodology. Since the modeling that AMBAG uses is not unique, I suggest that this is a statewide problem. I recently came across a letter to the San Joaquin Council of Governments that raises the same issue of estimates for lower GHG's that don't correspond with reductions in VMT, "We would like to see stronger VMT reductions

[1] Draft EIR on AMBAG MTP/SCS Table 32
[2] Draft EIR on AMBAG MTP/SCS p 373

that better align with the plan's GHG reduction emissions or better transparency to understand why the VMT decline is smaller than the GHG reduction emissions."[3]

If the AMBAG experience is prevalent across the state, VMT is continuing to climb, and inexplicably, regions are estimating that they will meet their GHG reduction targets.

I request that the Transportation Commission and the Air Resources Board ask for an independent review of the modeling by Metropolitan Planning Organizations in order to resolve the discrepancy between vehicle miles traveled and GHG emissions. (SB 375 places the responsibility on the Transportation Commission and the Air Resources Board for guiding travel demand models.[4])

On a brighter note, AMBAG has created a mitigation requiring that transportation agencies that build projects that increase roadway capacity and potentially significant levels of vehicle travel must "implement measures that reduce VMT". [5] The Air Resources Board should mandate all regions to take up this AMBAG mitigation.

Thank you for your consideration,

[3] Letter from Catholic Charities, Diocese of Stockton; ClimatePlan; et al 4/30/2018

[4] **14522.1.**(a) (1) The commission, in consultation with the department and the State Air Resources Board, shall maintain guidelines for travel demand models used in the development of regional transportation plans by federally designated metropolitan planning organizations.

[5] AMBAG MTP/SCS Final EIR, p F-7 "Transportation project sponsor agencies shall evaluate transportation projects that involve increasing roadway capacity for their potential to increase VMT. Where project-level increases are found to be potentially significant, implementing agencies shall identify and implement measures that reduce VMT. Examples of measures that reduce the VMT associated with increases in roadway capacity include tolling new lanes to encourage carpools and fund transit improvements; converting existing general purpose lanes to high occupancy vehicle lanes; and implementing or funding off-site travel demand management."