

9/2/09

Written comments on Draft RTAC Report provided by the following RTAC members for discussion at the 9/1/09 RTAC meeting:

1. Michael Woo
2. Jerry Walters
3. Mike McKeever

1 September 2009

Mr. Mike McKeever, Chair  
Regional Targets Advisory Committee

RE: CONCERNS ABOUT THE DRAFT RTAC REPORT

Dear Mike:

I regret that my job schedule has prevented me from attending the RTAC meetings on August 18 and September 1. However, despite my absence, I would like to share my grave concerns about the draft RTAC report.

During the last meeting I attended, in Los Angeles on August 5, the committee agreed that at least one of the approaches which MPOs would use to demonstrate attainment of their targets would be through some combination of modeling and "off-model" adjustments, including post processors, and potentially a list of best management practices (BMP).

I gather that during the August 18 meeting, a separate proposal was put forward to allow the regions to use a BMP only approach, and that 9 out of 15 members voted in support of this approach. Because I was not present for the vote, I would like to share my perspective on the potential risks of a BMP only approach, and suggest an alternative path forward.

**We should use all the information at our disposal.** One of the reasons I was pleased with the outcome of the Los Angeles meeting on August 5, was that I thought we agreed as a committee that CARB and the MPOs should use all available sources of information to set and demonstrate attainment of targets. Models complemented by BMPs seemed a perfect hybrid approach. I am puzzled that certain members of the committee believe that a BMP only approach is superior to a hybrid approach. Are regions to simply *ignore* the outcomes of their regional travel demand models? What are we to do in the eventuality (which is almost certain to occur in my opinion) that the travel demand models and the BMP approach yield conflicting results? Which are we to trust? The current report (p.22) suggests that if the BMP method achieves the target, the MPO can simply avoid running a full travel demand model. How can we be certain that the BMP approach is more accurate than the travel demand models when it lacks such critical region specific details? I think we have to use all the tools in the toolbox and that is why I support a hybrid approach.

**As a means to demonstrate adherence to their target, the BMP approach falls short of building community consensus on a vision for the future.** My greatest concern about the BMP approach is that if a region uses a list of policies, rather than a full blown land use development pattern and transportation network to meet their target, that the region misses a key opportunity to engage the public in envisioning what a better future could look like for their residents. As we learned through watching the SACOG experience, planning only works, and can work quite well, when stakeholders are actively engaged in envisioning the future of the places they love, none of which can occur with a spreadsheet tool.

**A hybrid approach creates greater accountability and provides for the transparency and understandability that are essential to effective public outreach.** I gather that some members of the committee—who, like me, have a background in local government—supported the BMP approach because they believed that a simpler process would be easier to convey to the public. I agree entirely that public outreach and understanding of this process is essential. Where I differ is that I think the highly valid transparency aims can be achieved with a hybrid approach, and we do not need a BMP only approach to make the process understandable to the public. CARB needs to see the region run its travel model to ensure that the plan will work, *and* the local agencies need the list of BMPs the region is planning to adopt in order to explain the SCS to the public. I'd also argue that local agencies will want a map, and a series of co-benefits—that only the regional travel model can provide—in terms of vehicle hours of delay reduced, air quality improved, open space conserved, etc., in order to evaluate the different SCS options in a public setting. *None of this co-benefits analysis would be possible with an SST/BMP approach.*

I strongly recommend that the committee consider moving forward with the best of both approaches: use the travel demand models to predict GHG outcomes, correct the models with post processors where they are deficient, and use the BMP/SST approach as a way for the regions to “show their work” or interpret the results of the travel demand model for the public, as a communications tool. SB 375 implementation and the threat of climate change are *far too important* for us to get the answer wrong by failing to avail ourselves of *all* of the tools in the toolbox as soon as possible. Since I am unable to attend today's meeting in person, I am requesting that we delay a final vote on these competing proposals until the Sept 16<sup>th</sup> meeting, where I believe we will have the greatest possible representation of all RTAC members.

Thank you very much.

Sincerely,

MICHAEL WOO

Member, Regional Targets Advisory Committee

Cc: Each member of the Regional Targets Advisory Committee

## Mike McKeever - RE: I won't be able to make today's RTAC

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**From:** Jerry Walters <J.Walters@fehrrandpeers.com>  
**To:** "MMcKeever@sacog.org" <MMcKeever@sacog.org>, "Karperos, Kurt@ARB" <kkarpero@arb.ca.gov>  
**Date:** 9/1/2009 7:17 AM  
**Subject:** RE: I won't be able to make today's RTAC

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Overall, I think the draft report is a very good start. Main statements with which I would disagree are:

Page 8, Step 3, second bullet -- should also encourage shifts toward more compact land use in anticipation of demographic and market trends independent of regional funding support

Page 16, "Disadvantages" under SST bullet -- data collection would be less complicated if coupled with expert panel process of setting model performance standards and expected BMP effectiveness. However, the SST would suffer from: being able to address only a limited set of BMP's and BMP combinations, and not being able to address critical SCS strategies and effects such as location-specific road pricing, transit service improvements, induced travel, and effects on traffic speeds and trip length on CO2 generation.

Page 16, "Disadvantages" under post processors -- tailoring to specific travel models is standard practice.

Page 21, Table, right column -- other limitations of BMP's include: very limited confidence that results are accurate for a full SCS, inconsistency with other analysis included in RTP's produced with MPO models, inability to account for variations among regions, effects of pricing strategies, induced travel and effects on traffic speeds and trip length on CO2 generation.

Page 22, under SCS Compliance Demonstration -- I disagree with the proposal that "large MPOs may opt to use the BMP option to develop SCS and demonstrate compliance at least for the first cycle of RTPs". Note also that Bob Johnston's comments to RTAC clarify his position on that subject, stating that MPOs should use models in the first round. Only role of an SST would be early scenario testing through April 2010 to inform draft targets. If used in subsequent RTP development processes at all, an SST could only be used as an early scenario screening tool, not for the actual consistency determination, and only used as a screening tool if its consistency with the regional model and conservativeness relative to the model have been demonstrated in a first-round RTP comparison of modeling results to SST results for the same regional SCS strategy package.

Page 24/25 under the 4 interregional travel cases -- My vote is for: 1) 50/50 split; 2) 50/50 split between region generating trip origin and region generating the destination, with no responsibility to the pass-through region; 3) and 4) 50% to the MPO generating the one trip end and State-level responsibility for the interstate, international, tribal land, and military base trips trip end.

Page 41, under Economic co-benefits -- I would add: lower up-front infrastructure costs for roads, parking structures, and lower associated environmental impacts

Page 42, under Integration into RTP Process -- I would add: RTP modeling analysis should quantify and the RTP should report the co-benefits related to mobility, economy, air quality, safety and energy independence.

Page 45, last sentence -- For reasons I cite above relating to page 22, I disagree with "we recommend these enhancements play an integral part of SB 375 implementation beginning with the second regional transportation plans prepared under this law." I recommend the models be improved to meet basic performance standards and sensitivity tests for the strategies included in the respective MPO's first-round SCS and RTP.

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**From:** Jerry Walters  
**Sent:** Tuesday, September 01, 2009 6:29 AM  
**To:** MMcKeever@sacog.org; 'Karperos, Kurt@ARB'; 'Kimura, Lezlie@ARB'  
**Subject:** I won't be able to make today's RTAC

COMMENTS ON DRAFT REPORT  
MIKE MCKEEVER

EDITING/WORDSMITHING – RTAC DISCUSSION PROBABLY NOT NEEDED

1. Page 1 – discussion on Scoping Plan needs to introduce concept of “most ambitious achievable targets”

PROBABLY MINOR SUBSTANTIVE ISSUES – MAY NOT REQUIRE COMMITTEE DISCUSSION

1. Page 9, 2. Expert Consultation – experts need not be limited to academics. Consultants and practitioners who do not have conflicts should be allowed as well.
2. Page 15 states that advantages of “points for policy” and “BMPs” include “may include a wide range of policies”. However, at last RTAC meeting it was agreed that the only items that would be included on the BMP list would be those for which solid scientific information existed to support the estimated benefits. This will narrow the universe of what is included on that list.
3. Pages 22 and 23, 5. Flexibility in Achieving Targets. Needs to be amended to reflect the Committee discussion/action that savings outside of the transportation sector can not be traded off against transportation savings (i.e. NEVs for land use is OK, trees for transit is not)
4. Page 24, Statewide Assumptions – not sure why “ARB should recommend a range of gasoline prices for use by MPOs...” Didn’t the Committee recommend ARB establish a single gas price for all MPOs to use?
5. Page 25, 12 Achievability and Ambitiousness of Targets. A note should be added that this section can be substantially expanded after the scenario modeling that will occur over next 6 months or so is completed, and that RTAC intends to meet once more to review those results.
6. Page 26, Housing and Social Equity, the sentence “Research suggests inequitable land use practices and inadequate public transit access as well as economic and racial segregation result in exclusion, limitations on employment opportunities, sprawl and excess VMT.” It is because this “science” does not yet exist that the Committee is recommending a substantial research effort in these areas prior to the second round of plans.

MAJOR SUBSTANTIVE ISSUE – COMMITTEE DISCUSSION NEEDED

1. Several inconsistent descriptions of how BMPs will be used. Needs to be clarified, especially on issue of whether they are allowed completely in lieu of model runs by the MPOs during the first round of plans.