September 3, 2009

The following comments were provided by SANDAG on behalf of Gary Gallegos, Regional Targets Advisory Committee (RTAC) member, for consideration by the committee.

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Page	**Section**	**Text**	**Comment**
7	MPO / ARB Interaction	Step 2	In first sentence, third line, change "extrapolate" to "aggregate."
8	MPO / ARB Interaction	Step 3	Add to first paragraph: "Using a bottom-up approach with input from regional and local officials and stakeholders, the MPOs would work with ARB staff to develop parameters . . ."
11	What are empirical studies?	The "causes" or inputs include land use strategies such as infill development, development mix, density, urban design (4Ds) and transportation strategies such as pricing, incentives, service improvements and other forms of TDM.	Inputs also include transportation investment including new transit service, increased transit operations, new roadway investments, operational improvements (smart corridors).
12	Why should CARB consider empirical studies?	Entire section.	Consideration should also be given to the interdependency between variables. For example, the effect of transit and smart growth combined exceeds the benefits of sum of the strategies being implemented individually.
12	Why should CARB consider empirical studies?	Three references to VMT.	While VMT plays a significant role in reducing GHG emissions, consideration should also be given to VHT, congestion, and regional alternative fuel programs.
12	How should CARB, the RTAC and the MPOs use empirical studies?	...as part of the their process to complete Step 1 - Draft uniform statewide reduction targets.	Language should be made consistent with "Target Setting Process" section.

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12	How should CARB, the RTAC and the MPOs use empirical studies?	As an example, the City of Stockholm instituted a pilot program for congestion charging in 2006 which reduced carbon emissions by 14 percent in the central city, and up to 3 percent citywide.	Comparisons to European and American travel behavior should be viewed carefully. European policies, transportation investments, and culture are not analogous to the United States.
12	How should CARB, the RTAC and the MPOs use empirical studies? Part 3	Entire section.	This is a long term model improvement program topic, and it is best to refer to CTC for consideration in the RTP Modeling Guidelines.
13	How Should CARB, RTAC and the MPOs use empirical studies?	For example, Los Angeles Orange Line, which opened in 2005, exceeded its ridership projections for 2020 within 7 months of opening.	Ridership exceeding projections is the exception not the rule. Empirical evidence should study aggregate results from multiple projects for identifying trends. FTA Ridership Analysis: http://www.fta.dot.gov/documents/NSPA2007_Final(1).pdf (page 20 / pdf page 25) FTA estimated that actual to predicted ridership for 18 projects in the new starts program was 74%, i.e. that projects were overpredicted in general. Only 8 of 18 projects would reach the 80% threshold by the forecast year.
14	Use of Modeling	...computer models currently in use at MPOs for travel forecasting, ranging from relatively simple "four-step" models to more sophisticated, activity-based models.	Four step models can be complex and include feedback processes, integrated tolling methods, and 4-D enhancements.
15	Modeling in SB 375 Legislation	For example, if travel demand models in use are unable to predict mode splits, the bill allows that other means may be used [§145221.1(a)(4)]	The citation is incorrect. It should reference §145221.1(b)(4)

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16	RTAC Discussion on Travel Demand Models	Section on 4-D Post Processor	Email from R. Curry to CIA Modeling Forum (excerpts from 8/27/09): "...too much emphasis is being placed on dealing with the "Ds" as a post-process technique. Post-processes are used when you have not found a method to deal with phenomena eloquently in your current model structure. I would instead argue that one should attempt to find methods for bringing the "Ds" back into the modeling steps rather than surrendering to the fact that the model doesn't handle them effectively and go about post-processing the model results (assuming that you have fully investigated which portion of which "Ds" you do not handle correctly in order to massage them appropriately afterwards). Post-processing is a good first step to deal with models that are insensitive to "Ds", but it should not be the final step."
17	Travel Model Assessment and Documentation	Entire section.	This is a long term model improvement program topic, and it is best to refer to CTC for consideration in the RTP Modeling Guidelines.
17	Travel Model Assessment and Documentation	Experimental sensitivity testing should be performed on all exogenous input variables (e.g. age, income, automobile operating costs)...	Policy makers have little control variables such as age and income. More focus should be given to areas where policy makers can control outcomes such as congestion pricing, parking pricing, fare discounts, increased transit service, reduced speed limits, etc. MPOs should only test variables that have the most potential to effect change. Testing "all" variables would potentially be an undue burden.

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18	Model Improvement Program	Entire section.	This is a long term model improvement program topic, and it is best to refer to CTC for consideration in the RTP Modeling Guidelines.
20	Approach	3) policies contained in current RTP/congestion management plans (CMPs), and....	This also should reference blueprint plans (RCP) since some regions that 'opt out' won't necessarily have a CMP.
22	Best Management Practices: Potential Applications	CARB Approval and Public Review of SCS: In lieu of re-running each MPOs transportation and land use model, CARB staff can use the BMP option to QA/QC MPOs submittals for reasonableness ("reality check") as part of its SCS approval process. Similarly, the public is also afforded a relatively user-friendly tool to participate in the public input/comment process in a more meaningful and timely manner.	Is ARB really intending to re-run the MPOs transportation and land use models? How would they do it? Sending ARB staff to each MPO? Does ARB staff have the expertise to run and interpret various travel demand modeling software? (This comments may have been addressed during the 9/1 RTAC meeting.)
23	Accounting for Statewide Fuel and Vehicle Technology	Entire section.	RTAC needs to recommend accounting order: state wide consideration before MPO consideration or vice versa.
24	Statewide Assumption	ARB also could recommend consistent assumptions for use when developing population and employment projections.	SB 375 already recommends a +/- 3 percent threshold for MPOs to match DOF population projections. Government Code §65584.01(b)

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24	Statewide Assumption	The Committee recommends that ARB require MPOs to use consistent key assumptions across the state. Model outputs vary with differing model input assumptions, especially for those to which a model is most sensitive. Certain key assumptions therefore should be consistent statewide to ensure equitable assessments of MPO model outputs, including scenarios. For instance, ARB should recommend a range of gasoline prices for use by MPOs in their transportation models.	The report should clarify the timing of these ARB requirements regarding consistent key assumptions across the state. I support the concept but it would be extremely hard for an MPO to change key model assumptions in the midst of an RTP development (these changes most likely would require re-validating the base year model and explaining different travel demand forecasts than those previously produced).
37	Target Audience/Stakeholders	LOCAL/COMMUNITIES	Add 'Special Districts' to list
39	Flexibility in Designing Strategy	Each region will be required to perform a detailed and complete EIR for their SCS. Upon certification of the EIR for the SCS by the MPO...	The EIR is for the entire RTP. This section should be re-written to say "EIR for the RTP, including the SCS, by the MPO..." May be a range of dates could be provided in the timeline. The timeline also should reflect "RTP EIR" instead of "EIR on SCS."
39-40	Flexibility in Designing Strategy	Due to this timeframe (see below), which can take from 9-12 years in total...	The text and table (timeline) is confusing and needs to be clarified. Instead of specific dates, perhaps a more general statement about the timing of implementing various GHG reduction strategies should be included. Additionally, it should be stated that this timeline is an example of a potential schedule and each MPO would have a different schedule. May be a range of dates could be provided in the timeline. The timeline also should reflect "RTP EIR" instead of "EIR on SCS."

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42	Integration into RTP Process	RTPs are approved an MPO's board, along with a transportation conformity determination that ensures that the region is on track to meet air quality requirements. The documents are then transmitted to the Federal Highway Administration.	The MPO also is responsible for certifying the RTP EIR, in addition to approving the RTP and conformity determination. Additionally, the documents are not just submitted to FHWA but also to the Federal Transit Administration and Environmental Protection Agency.
42	Integration into RTP Process	SB 375 requires an additional document, the Alternative Planning Strategy (APS), to be created by an MPO that has determined it will not reach its region's target through its SCS. The APS is a separate document and is not required to meet federal and state requirements for RTPs.	Although the APS is a separate document, SB 375 states that the APS may be adopted concurrently with the RTP [§65080(b)(vi)(H)].
42	Integration into RTP Process	The RTP serves as one of the key documents used by the federal government to identify and fund transportation projects and programs in a region.	... fund transportation projects, programs <u>and services</u> in a region.
44	Model Enhancements	Entire section.	Good overview of modeling process for RTAC. Consideration should be given to moving most of the modeling mechanic to CTC and leaving this as the modeling discussion in the RTAC recommendations.

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	N/A		As part of the methodology, the RTAC should determine which model or methodology should be used to estimate GHG or CO2 emissions. If EMFAC is selected, the RTAC should specify which version should be used (current version is EMFAC 2007 but EMFAC 2010 is under development). Should it be the same version approved by U.S. EPA for transportation conformity? There may be an issue of federal grace periods that could result in MPOs using different versions of EMFAC to develop an RTP air quality analysis.
	N/A	Entire Document	ARB should make sure wording like "must", "should", "will" and "shall" is used consistently and appropriately throughout the document.