
From: Shari Libicki [mailto:slibicki@Environcorp.com]
Sent: Thursday, September 10, 2009 7:34 AM
To: Ito, Doug@ARB
Cc: Karperos, Kurt@ARB; Mike McKeever
Subject: FW: Track Change Version of RTAC Report

Doug –

Thanks again for the hard work of you and the ARB staff.

I reviewed yesterday's report (rapidly, I confess) specifically to look for the incorporation of the changes that I had suggested last Thursday. Although I noticed a few of the changes incorporated, my rapid review indicated that most were not incorporated. First, let me apologize, in advance, if the changes were incorporated, but I missed them. For those that I could not find, could you help me understand a) if you did incorporate it, but I missed it, or b) if you didn't incorporate it, why?

Of course, there is the ISR issue, but I understand that will be discussed at the next RTAC meeting.

For ease of your review, I am repeating those that were not incorporated below, and I have also highlighted them in the attachment. The page numbers below refer to the attachment that I sent on Thursday, that I am reattaching here.

Thanks, in advance, for your responsiveness on this, and please accept my apologies if I simply missed the incorporated changes. I checked for them, first, in the section where I originally commented, and second, with a word search. This was an imperfect means of checking, I realize.

Below I list each of the recommendations for which I could not find inclusion.

1. Bottom of page 7: ARB staff would also compare baseline GHG estimates with MPO fuel use data for comparison. To the extent that there are discrepancies, ARB will attempt to understand the source of the differences.

The report does say, "The Committee has discussed tracking of both vehicle miles travelled (VMT) and fuel usage data as two important means for verifying greenhouse gas emission reductions from changes in vehicle use.", but falls short of stating that some on RTAC recommended truing up the modeled predictions with fuel use data. This was something that was discussed several times during RTAC and, it seemed to me, generally supported.

2. Middle of page 10: Given the critical nature of the public process, ARB shall respond in writing to public comments before the targets are approved by the Board. Given the critical nature of the public process, ARB shall respond in writing to public comments before the targets are approved by the Board.

3. Middle of page 12: However, empirical studies must be used with caution, as its critical to include all important variables in the empirical relationships.
 4. Top of page 21: In addition, the limitations of the BMP calculator should be clearly discussed.
 5. Middle of page 22: The removal of the term, 'project level' [I do not recall project level compliance was actually discussed for BMPs during the RTAC meetings]
 6. Bottom of page 22: regional fuel purchase data, and mandatory odometer reporting with automobile and light-duty truck registration,
 7. Page 32: Support for the establishment of a program to gather VMT data annually during vehicle registration. (see notes above on this)
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