

# Transportation Solutions Defense and Education Fund

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“Solutions Is Our Middle Name”

July 7, 2010  
By E-Mail

Doug Ito  
Air Quality and Transportation Planning Branch  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Regional Target Setting for MTC

Dear Mr. Ito:

TRANSDEF, the Transportation Solutions Defense and Education Fund, would like to provide you with the following points regarding MTC's submissions on the setting of its GHG emissions reduction target, so that you can properly evaluate how aggressive its strategies actually are:

1. The 2009 RTP was a Business-As-Usual plan whose showcase project is the widening of Bay Area highways.
2. We strongly disagree with the MTC-CARB assessment that “Current RTPs move us in the right GHG direction.”
3. We contend that MTC's RTP seriously underestimates GHG emissions. The analysis is flawed due to the travel demand model's inability to feed land use changes back into the model. Assuming static land use ignores the effect of induced demand.
4. It is now well-known in the transportation community that widening highways has the effect of increasing GHG emissions in the long-term.
5. Mr. Heminger made the observation that “Our analyses consistently have found that infrastructure, by itself, does not do much for reducing GHG emissions.” While we heartily agree that MTC selection of infrastructure projects “does not do much for reducing GHG emissions,” MTC has no evidence to demonstrate that this statement can be generalized into a principle.
6. MTC explicitly refused to develop such evidence. They refused to work with us to develop a Maximum Emissions Reduction Alternative for the 2009 RTP. In the absence of an analysis of such an alternative, MTC has no evidence to support Mr. Heminger's observation as a generalizable principle.

7. There is good evidence to support the contention that MTC's indifference to cost-effectiveness is the cause of Mr. Heminger's observation: MTC failed to satisfy its TCM 2, a commitment to achieve a 15% increase in regional transit ridership over 1982 levels. Despite twenty years, despite a large growth in population and despite many billions of dollars spent on transit expansion, this target has still not been met.
8. Instead of policies to make transit convenient and inexpensive, extremely costly BART extensions have done little to increase ridership. Of course, this kind of project selection does little for GHG reductions.
9. As part of a lawsuit settlement with us, MTC analyzed the TRANSDEF Smart Growth Alternative in the EIR for the 2005 RTP. It eliminated all highway capacity additions and BART extensions, focused all future growth on infill, added a large amount of cost-effective transit, and added a pricing component to decrease the attractiveness of driving. It reduced VMT by 3% compared to the fiscally constrained Project.
10. The fact that MTC was unwilling to test a different infrastructure package in the 2009 RTP strongly suggests that MTC's commitment is to delivering committed projects, rather than to emissions reductions or other environmental results.
11. MTC plays hide-the-ball with its EIR analysis: it places projects approved in past RTPs in the EIR's No Project Alternative. Unbuilt projects are thus treated as if they are already built. Using this strategem, MTC refuses to show the impacts of the exercise of its discretion. If all the expansion projects were considered as part of the Project Alternative, it would then become obvious that MTC could consider entirely different policy alternatives. This approach is an insidious effort by MTC to portray itself as having its hands tied, since almost all its funds go to "maintenance." Despite years of our complaints, this gambit still continues.
12. Extremely expensive projects in the RTP, including the BART extension to San Jose, e-BART and the Muni Central Subway, have minimal transportation benefits. These are political pork, plain and simple. If the funds were instead put into cost-effective transit, we would see enhanced emissions reductions.

In this letter, we have sought to make the ARB aware that MTC has not been candid about what is ambitious and achievable in the Bay Area. Because of its long-standing insistence on maintaining its current list of committed projects, MTC has understated the potential for more significant emissions reductions.

With our extensive background in this subject area, we would be pleased to answer any questions you might have at the phone number above.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President

cc: Joint Policy Committee