

# Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

November 1, 2016  
By E-Mail to:

Susan Bransen, Executive Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

Re: RTP Guidelines Update

Dear Ms. Bransen:

TRANSDEF finds the excerpts cited below of MPO comments on the first draft of the RTP Guidelines update to conclusively demonstrate the MPOs' refusal to acknowledge the preeminent role of transportation in the generation of GHGs. Because these agencies control the implementation of climate policy for this critical sector, that refusal implies a further refusal to commit their full powers to the battle against climate change. One can only conclude that their efforts to reduce GHG emissions will be grudging and inadequate, resulting in the state's failure to meet its overall GHG emissions reduction targets.

Given the MPOs lack of concern, issuing the RTP Guidelines update in essentially their current form would result in unsatisfactory outcomes. TRANSDEF therefore requests and recommends that you call a halt to the finalization of the Guidelines, in the recognition that MPOs and state agencies need to be working in concert to protect the climate. We suggest that you put the Guidelines update process on hold, pending resolution of the disagreements between the MPOs and state agencies. The consequences of climate change are far too catastrophic for policy to be ignored due to institutional infighting.

Here are the excerpts I sent you following the Thursday meeting of the workgroup revising the RTP Guidelines. They were extracted from the comment log of the comments received from MPOs on the first draft of the RTP Guidelines update:

- MPOs reject the distinction between "shall" and "should" made in the 2010 Guidelines, long after many of the same personnel agreed to them back then. (SBCAG)
- They don't want to acknowledge transportation (and therefore, themselves) as being responsible for fully half of all GHG emissions, and would rather have only the tailpipe emissions cited. (AMBAG, SANDAG)

- They object to calling transportation a "significant source of GHGs" and request it be termed "one of multiple significant sources of GHGs." (SCAG)
- They object to a published ARB paper on induced demand. (OCTA, SCAG)
- They want to treat GHGs like criteria pollutants, where tailpipe regulations, not agencies, are responsible for eliminating the problem. (OCTA claims that the "CTP 2040 demonstrates that the best long-term method for reducing GHG emissions is ... zero emissions vehicles..." implying that VMT reduction is not.)
- SCAG asserts not only that "growth is inevitable", but that it will lead to increased GHGs: "RTPs do not worsen greenhouse gas emissions which are contributed by new growth in the region and throughout California." This is a rejection of SCAG's responsibility for transportation planning. The implication that mode share is immutable is a rejection of VMT reduction as a GHG reduction strategy. The reference to feasible and practicable mitigations appears to be setting up the grounds of an excuse that the RTP is essentially powerless to affect future GHGs. Clearly, the Age of Climate Change will require pushing the boundaries of public acceptance, if the state's climate goals are to be met.
- SANDAG's request for deletion from the Guidelines of ARB's calculation that no more than a 5.5% increase in VMT would comply with the Executive Order, on grounds that it does not "help the public understand the purpose of an RTP/SCS," is pure obstruction. (OCTA objected too.) This calculation is the single most powerful data point in the Guidelines. It acts like a warning flag to transportation professionals that they cannot continue their Business as Usual practices. Removing it would eliminate the warning.

CTC's editorial staff incorporated these comments as if they were editorial suggestions rather than policy disagreements, while climate-supportive stakeholders' comments were often ignored.

After an attitude reset, we believe that the most productive way to move forward would be to reopen the comment period on the first draft from back in July. That draft (after it receives the extensive copy editing called for by multiple comment letters) best reflects the state of agreement that existed on the 2010 update, making it the logical place from which to make a fresh start. We stand ready to assist in any way we are able.

Sincerely yours,

/s/ DAVID SCHONBRUNN

David Schonbrunn, President

CC:

Ken Alex, OPR

Mary Nichols, ARB

Brian Kelly, CalSTA