October 25, 2024, email from SLOCOG to CARB about the target update

From: James Worthley

Sent: Friday, October 25, 2024 1:24 PM

To: Lezlie Kimura

Cc: John Beutler

Subject: RE: CARB Request: MPO target recommendation for SB 375 target update - by October 31, 2024

Hi Lezlie,

In order to provide input and to help shape the process, SLOCOG staff developed some input for your consideration. With competing priorities and uncertainty (2005 BY VMT) in the past 3 months, we could not create the comprehensive results from a fully developed draft SCS necessary to complete all requested metrics, but we aimed to provide you with some useful feedback. Looking at the file you provided, we were uncertain of data sought for many of Strategy Assumptions tab items – many are unclear or do not exist within any of our RTPs. We would be happy to meet with you or consider any data or recommendations that you may wish to provide for us to further this discussion.

We reviewed the latest datasets to inform target development for future years 2035 as well as a potential target for 2045 should that be implemented. One crucial dataset with significant impact is the recent population forecast from the California Department of Finance (DoF), Table P-2A (September 2024). This forecast for 2035 and 2045 predict notably lower population levels than was forecast previously: a -6% and -5.5% respectively when compared with the past 2 RTPs. Using a reduced 'per capita' denominator, SLOCOG's VMT per capita and CO2 per capita will increase.

In our process to develop results and input for your consideration, we considered and worked in key variables and metrics, including: induced travel, ix/xi handling, 2005 basis for comparison, future growth patterns adjusted within the model based upon the new DoF forecast, and more. Overwhelmingly, the key factor for change in the wrong direction is the new DoF figures. This moves the needle in the wrong direction without a way to offset (within RTP financial constraints) VMT created by homes and people that existed prior to 2005.

Results using per capita compared to 2005 (percent change of a percent reduction): On the Target Reco tab, everything hinges on the 2005 VMT – our 2005 number is being questioned now for the 2023 RTP so we do not know what 2005 VMT we should use here for target setting purposes. The current methodology sees 2035's percentage decrease (go in the wrong direction) by 20% - 100% or more; this change is entirely dependent upon how

2005 VMT calculation is agreed upon. (We did not have time to work with CARB staff to nail this down to prepare precise results; more time is necessary to develop an agreed upon process). The most straightforward path for 2005 VMT is to use the same VMT that was approved in the 3 prior RTPs. If this is acceptable, we can move forward with calculations on this tab.

In short, targets set that rely upon comparison of 2005 vs 2035 that use 'per capita' as a calculation factor creates a (unsolvable) problem for any county the DoF has significantly reduced numbers for and, conversely, provides a 'pass' for any counties that see DoF increases. How will new targets be set to account for this and any future adjustments as DoF projections changes?

Please consider new approach(es):

1. **Develop targets that consider Land Use reductions of VMT separately from Investment reductions based on: growth rate changes and urban densities.**

Both growth rates and urban densities differ greatly throughout the State. Regions with growth rates (DoF expectations) that exceed 7% (2020 to 2035) have opportunity to reduce the per capita VMT as compared to 2005 using the increasing 'per capita' growth; slow growth counties do not have the same ability to markedly offset the 2005 land use pattern. Similarly, dense urban areas are already set up to reduce VMT using additional investments to augment and expand existing public transportation systems (high quality transit, rail, subways) whether or not they add new population; more rural areas do not have this opportunity and also do not have the same level of funds to invest.

2. **Develop Target years that are adequate for planning purposes and are not static that eventually turn into 'tomorrow' and then become 'yesterday.'**

MPOs create long-range plans for the future, and are not able to change the past. Plans should be measured on how well we plan, not how well the past performs and not needing to be readjusted with changes from DoF. New, better, growth now and into the future cannot offset 2005's (without significant population growth) existing land use patterns: homes, neighborhoods, communities, and cities were built over many decades and some areas are now and always will be too rural to effectively serve with transit.

2035 is a static year. Our RTPs affect future time frames of Short-, Mid- (sometimes these two are combined), and Long-terms. A better approach would be to set targets for the RTPs that were based on Short+Mid terms (often 10 years ahead) and Long (often 10-15 years ahead). Planning then works. Soon enough, planning for 2035 will be a few years away or even in the past (as was Year 2020 targets within our 2019 and 2023 RTPs). Please address this with forethought now so that the 2020 issues ('planning' for a past year) are not a part of the 203x RTPs.

3. **Set targets based on Planned Land Use VMT compared against Existing (or Past) Land Use VMT**

Compare VMT (homes or people would work in the example) of what is planned in the RTP vs. what exists or is generated by existing land use patterns if nothing else changed (current year would be best, 2005 alternatively). Example: If 100k existing homes average 50 VMT/day, and all planned homes average 25 VMT/day (because most are well located) – this is a 50% reduction over existing. The measured result should be the same for 100 homes or 10k homes … if all were in the same location(s). **This allows slow growth regions to plan, show, and realize change,** regardless of DoF adjustments and focuses efforts on what the MPO plan can change. Current methodology is heavily weighted on the total number of homes (people) that preexist. Example: a 100k home region adding the *same* 100 homes will not show any realized reduction, at 50%-reduced VMT, nor even at ZERO VMT per unit (50 VMT vs. 49.95 VMT). A 100k home region that adds 10k units (10%) shows a reduction though (~-5%). The growth patterns are identical, but results are only seen if significant growth offsets the preexisting conditions.

If, in the end, a single VMT reduction target is desired based solely on the prior SCS-evaluation process (no improvements considered or made to this process), we can produce this once we have CARB staff thoughts on the 2005 VMT. We look forward to collaborating with you on this further,

James

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