

Comments on 2010 Working Draft, California Regional Transportation Plan Guidelines

October 26, 2009 version

Submitted by Santa Clara Valley Transportation Authority

November 10, 2009

Comment 1:

Section 3.1 RTP Modeling Requirements and Recommendations

In this section, the evaluation of impacts to low-income households should also consider travel times (or generalized costs that also include travel times) in addition to or in place of costs, if LOGSUM values cannot be developed for the MPO region.

Comment 2:

Section 3.2 Regional Economic and Land Use Model Recommendations

While there is a detailed description as to the sensitivities the land use model should have as an application tool, there is no mention of the need to have a base year validation for the land use model. Since changes in the distribution of development patterns may be a significant variable in predicting GHG emissions reductions, there needs to be confidence that the land use models are calibrated and validated to a base year and also backcasted to a known year to ensure the model is reasonably accurate. There should also be a series of sensitivity analysis performed on the land use models to ensure an understanding of the sensitivity the models have to changes to specific input variables. This should be a part of the model documentation each MPO is required to provide for public review and understanding under SB 375 if a land use model is applied by the MPO region.

Comment 3:

Section 3.3 Model Peer Review, Testing and Documentation

If model validation criteria are to be listed in this section, than the criteria need to be expanded to include transit validation results, if applicable to the MPO region. As with land use patterns, changes in transit supply and demand will be an important means to reduce GHG emissions, therefore, there must be confidence that the models are validated to base year conditions as well as tested with a series of sensitivity analysis to determine model sensitivities. This should also be a part of the model documentation each MPO is required to provide for public review and understanding under SB 375.

Comment 4:

In Chapter 3 Modeling, several sections are noted to be in the process of being rewritten and are denoted by strikeouts or bold highlighting. These sections need to be provided in any subsequent drafts to ensure there is a chance to provide comments before final language is adopted.

Comment 5:

There appears to be a great deal of language to ensure that the travel demand models have been tested to ensure there is a basic understanding of model sensitivities to input variable changes. It is important to note that there are other models that may also benefit from sensitivity analysis testing, including both the land use models and the air quality models used to calculate emissions inventories. While emissions modeling is out of the scope of the RTP Guidelines upon which we are providing comment, we would suggest that if not already addressed in other documents, consideration be given to varying inputs for the determination of GHG emissions, such as assumptions regarding vehicle mix, fuel efficiency factors and vehicle technology, and what effects changes to these input variables would have on the GHG emissions levels.