

MPC 6.c - Attachment 2

LCOG Staff response to comments by Mr. Mark Robinowitz on the draft Air Quality Conformity Determination, made during the public hearing at MPC on December 8, 2011:

In general:

An Air Quality Conformity Determination (AQCD) responds to specific requirements to assure that the progress achieved in reducing a formerly excessive emission of a particular pollutant is not reversed if the plans being considered are executed. The AQCD assumes a project list is provided and analyzes the impact of that project list on the pollutants for which the area is required to monitor for transportation. The AQCD does not choose or make tradeoffs between projects. *Thus, the TIP and RTP project lists are not assessed in an AQCD for any issue other than the emission of carbon monoxide (CO) in this area.* The CO budget which must be met was set by LRAPA with concurrence by EQC and by USEPA at the time this area achieved the required air quality standard for CO. The emissions calculated for CO must be less than this budget for the AQCD to be approved.

1. Are other industries required to reduce their emissions?

The MPO is a transportation planning entity. Only emissions due to vehicle traffic are considered in Transportation Conformity analysis.

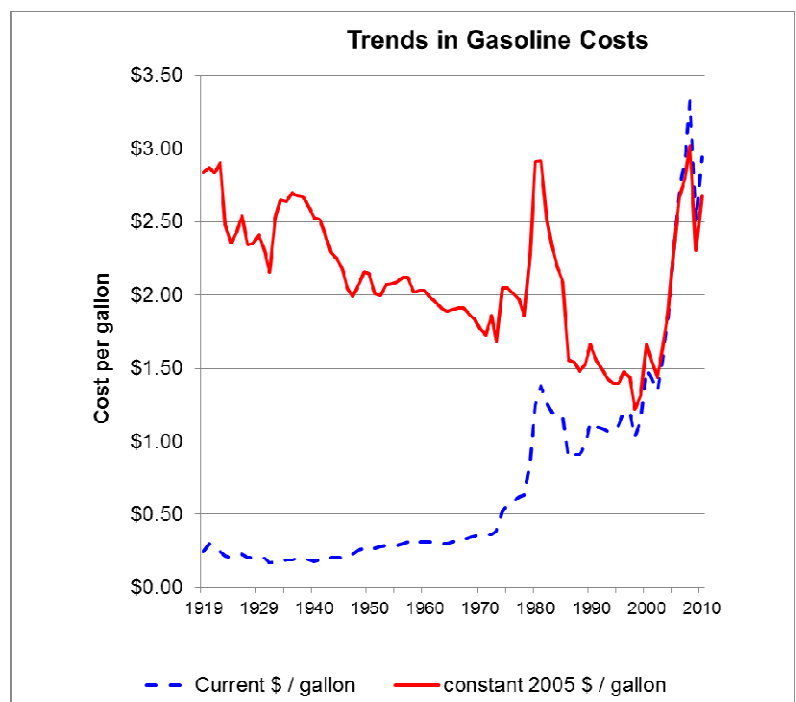
2. Inversions trap pollutants and cause health hazards.

The impact of inversions on the air pollution levels are captured by the air quality monitors. CO emissions are dominated by cold weather conditions and the highest readings occur in winter. The last exceedance of the standard for the 8-hr CO standard was in 1985 and the 2010 reading of 1.3 ppm was far below the standard of 9 ppm. Thus, no adverse chronic conditions for CO have been detected since 1985. The forecast indicates that this situation for CO should not change.

3. Assumed gas prices are too low.

Future gas prices are very difficult to forecast particularly with fluctuations experienced over the last few years.

Costs must be considered relative to inflation in wages and income, and thus costs are properly compared when referenced to a particular year rather than using current year dollars. This chart shows the trend in gasoline costs since 1919. Fuel costs in 2011 are equivalent to what they were in 1981 and even in 1922, adjusted for inflation.

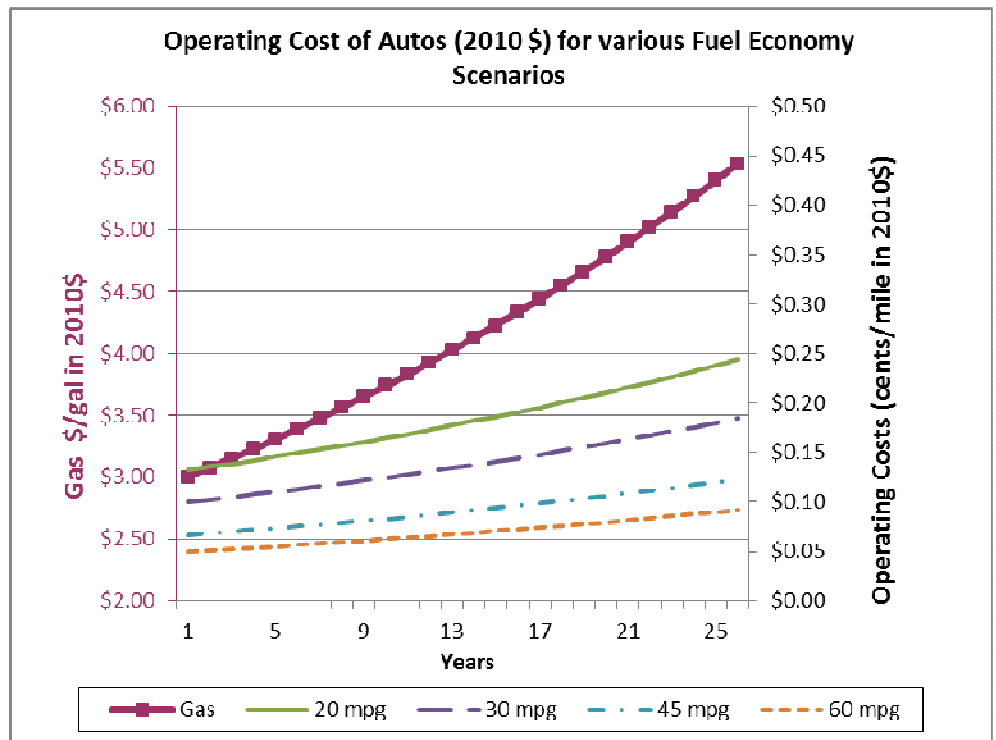


However, the costs of travel are not merely a function of gasoline prices per gallon. Increasing fuel economy offsets increasing gasoline costs. The analysis model uses cost per mile to reflect the combination of the fuel cost and the fuel economy of the fleet.

The **cost (in constant year dollars) per mile** of operating a passenger vehicle as computed by the AAA shows that the cost in 2010 was slightly less than in 2007, and was only 3.5 cents per mile more than in 2002. That is, for an average one-way trip distance of 3 miles, the cost per round trip is only 20 cents more in 2010 than in 2002.

Persistent high fuel prices are expected to result in improvements in fleet fuel economy either through user demand and/or by government regulation. CAFÉ standards and other fleet improvements such as development of EVs and hybrid vehicles result in expectations of a fleet economy of 50 mpg or even more in the 2035 time period. Further, higher gas costs are expected to result in higher consumer acceptance of smaller, more fuel efficient cars and in the purchase of alternative fuel vehicles such as EVs which use no gasoline. Thus, as fuel prices rise, a shift in the fleet composition from older, less fuel-efficient vehicles to newer, more fuel-efficient, LEVs and EVs is rationally expected.

Thus, an additional but very important factor in determining the auto **cost/mile** is the forecast of the future fleet fuel economy. This graphic illustrates the interaction of cost (adjusted for inflation) and fuel economy. A driver of an auto with 20 mpg in 2010 (year 1) would see **less cost/mile in 2035** if he then operated a vehicle with 45 mpg (assuming that gasoline increases at an average of 5% per year – the average since 2000, and wage/income inflation occurs at 2.4% per year – the average CPI since 2000).



This AQCD uses a scenario that does not assume a radical increase in the percent of trips made by modes alternative to the auto. The emissions computed are thus higher than if a large mode shift was to occur away from autos. Nevertheless, the CO budget is easily met as required.