

# MONTEREY COUNTY



## COUNTY ADMINISTRATIVE OFFICE

Ashley Paulsworth  
Sustainability Program Manager  
Intergovernmental & Legislative Affairs

168 West Alisal St., 3<sup>rd</sup> Fl  
Salinas CA 93901-2680  
(831) 755-5145  
[www.co.monterey.ca.us](http://www.co.monterey.ca.us)

Response to LandWatch

April 29, 2022

Mr. DeLapa:

Thank you for taking the time to review and provide comments on the Draft Greenhouse Gas Emissions Inventory Report (GHG Report) for the Monterey County Community Climate Action and Adaptation Plan (CCAAP). The County seeks to develop the CCAAP with the input and local knowledge of stakeholders. The County understands the challenges posed by the availability of data for on-road transportation emissions sources. The County is in close coordination with the Association of Monterey Bay Area Governments (AMBAG) to find a solution to meaningfully and accurately account for GHG emissions associated with vehicle miles traveled (VMT), and the CCAAP will provide strategies to reduce VMT both on local roads and highways.

The comment letter points out a discrepancy in the HPMS Public Road Data that was used in the GHG Report. The VMT number presented on page 4 of the appendix to the GHG Report differs from the 2019 HSMP Public Road data when annualized. The difference between these two estimates of VMT is due to the California Department of Transportation (Caltrans) updating the HPMS data. The data used for the community GHG inventory was obtained from the second version of the 2019 Public Road Data Report. After this data was obtained from Caltrans, a third version of the report was released that had different VMT.

The comment letter also describes a methodological error in the HPMS data analysis and discusses what type of VMT accounting methods should be used for the County's CCAAP (i.e., origin-destination). The County considers the current VMT used in the GHG Report a placeholder until data is available that meets the methodologies recommended in the comment letter. Through conversations between County staff, AMBAG staff, and stakeholders, the County will update the VMT estimates used in the community GHG inventory using a method similar to the recommendations of the comment letter.

While this approach is not fully refined, the County anticipates this approach will involve using the California Air Resources Board's (CARB's) EMFAC2021 model to obtain total countywide VMT for Monterey County. VMT will be assigned to the unincorporated county using a population-based approach (i.e., allocating a portion of the total countywide VMT to the unincorporated county based on the ratio of the unincorporated county's population to the total county's population). This method would be more accurate than the previous method because it would use EMFAC2021, CARB's most recent on-road transportation model that aligns with the California statewide GHG emissions inventory. The approach to evaluating VMT is still under consideration by County staff and will be released with the final CCAAP.

The County looks forward to continuing to work together to create a climate plan that works for all of Monterey County's diverse and important economic, social, and environmental resources.

Sincerely,

*Ashley Paulsworth*

Ashley Paulsworth  
County of Monterey  
Sustainability Program Manager

