

January 26, 2026

Heather Adamson, Executive Director
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Re: LandWatch comments on Draft EIR for the 2050 MTP/SCS and Regional RTPs

Dear Ms. Adamson:

On behalf of LandWatch Monterey County, please accept these comments on the draft EIR for the 2050 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties. Our comments focus on a range of concerns.

First, it is not clear to us whether and how AMBAG's Regional Travel Demand Model, used to develop the MTP/SCS and the EIR, adequately reflects the VMT reduction benefits of shorter trip lengths from provision of more affordable and dense housing units. In particular, we are concerned that the modeling may not capture the VMT reduction benefits from shorter trip lengths that would result from increased provision of affordable housing in areas with a high number of low wage jobs and a current lack of affordable housing. The presence of cities in Monterey County with substantial shortage of affordable housing for its low wage workers creates a significant opportunity for VMT reduction. However, if the modeling only reflects reduced trip numbers but not reduced trip lengths, it would fail to capture the VMT reduction benefits of better matching affordable housing to low wage jobs locations.

AMBAG must assure that its Regional Travel Demand Model accurately reflects these VMT reduction benefits because the DEIR identifies provision of affordable and denser housing units as VMT mitigation. Furthermore, the model will need to support the mandate in AB 130 to identify "location efficient areas" for provision of VMT mitigation through affordable housing.

Accordingly, we have asked a number of questions to help the public understand how the Regional Travel Demand Model assesses VMT from provision of affordable housing and denser housing.

Second, we are concerned that the EIR's significance conclusion for VMT impacts is meaningless if, as the EIR concludes, the MTP/SCS projects would have no effect on per capita VMT. We are also puzzled by the claim that the MTP/SCS scenario "minimizes" VMT if, indeed, it has no effect on VMT.

Third, we are concerned about the absence of a meaningful threshold of significance and any quantification of induced travel due to roadway capacity additions. We ask that the DEIR be revised and recirculated to address this informational shortcoming.

Fourth, we are concerned about the lack of information about the land use effects that would be caused by the changes to the mix of transportation projects in the EIR Alternatives scenarios. The EIR does not explain how these alternatives affect land use or identify the actual changes to the land uses that were assumed in the preferred project scenario. We ask that the EIR be revised and recirculated to provide this missing information.

I. Background regarding relation of affordable housing to VMT

A. VMT is increased where insufficient affordable housing is located near low wage jobs.

As the MTP/SCS acknowledges, low wage workers live in inland cities where housing is affordable, but many work in the coastal areas, creating "a persistent jobs/housing imbalance." (MTP/SCS, p. 4-9.) This situation is not just a generalized jobs/housing imbalance affecting all workers and all housing types; it is particularly an imbalance between low wage jobs and the affordable housing needed by low wage workers.

For example, the City of Monterey has many low wage hospitality jobs and other low wage industry jobs, a bad jobs/housing balance, and a real shortage of housing affordable to low/moderate income wage earners. Monterey's 3.0 jobs per housing unit is the third worst in the County and represents 40,989 jobs.[1] As a result, thousands of hospitality and other low wage workers must commute from less expensive cities in the Salinas Valley. Census data shows that 41.5% of workers in the City of Monterey earn less than \$3,233 per month or \$40,000 per year.[2] The Census Department's Inflow/Outflow analysis for 2022 shows that of the 20,097 workers employed in the City of Monterey, 17,682 commute from outside the City and only 2,415 live and work in the City.[3] Thousands of those commuters must be low wage workers, whose VMT generation could be reduced if there were available affordable housing in Monterey.

Gonzales also has more low wage jobs than affordable housing. Gonzales' 3.2 jobs per housing unit is the second highest jobs/housing ratio in the County.[4] However, these are primarily low wage service, manufacturing, and agricultural jobs, generating a relatively low median income for households of \$73,906, well below the County average.[5] Fifty percent of residents are in lower income households, i.e., households earning less than 80% of the Area Median Income.[6] Census data for 2022 shows that 58% of Gonzales' individual workers earn less than \$3,333 per month, i.e., \$40,000 per year.[7]

The Gonzales Housing Element admits “[t]here is a particular need for more moderate- and lower-income housing units to support workers in agriculture, retail, manufacturing, and other lower-wage industries.[8] It also acknowledges “Gonzales has a high number of workers commuting in and out of the City, with few residents working in the City (Figure 29).”[9] The Housing Element’s referenced Figure 29 is the Census Departments’ analysis of commuting inflow and outflow, showing 2,408 in-commuting, 2,512 out-commuting, and 254 living and working in Gonzales.

B. CalEEMod and CAPCOA VMT modeling for affordable housing does not capture the benefit of co-locating affordable housing and low wage jobs because it assesses only trip numbers, not trip lengths.

The CalEEMod model is commonly used for project level environmental analysis. Based on analysis provided by the California Pollution Control Officers Association (CAPCOA), the CalEEMod model identifies VMT reductions from provision of affordable units (also termed “below market rate” or BMR units). However the estimate of VMT reduction from affordable units is based only on the reduced trip numbers for affordable housing, not trip lengths.

The CAPCOA documentation explains that the “[p]ercent reduction in VMT for qualified units compared to market rate units” is calculated as follows:

The 11th Edition of the ITE Trip Generation Manual (ITE 2021) contains daily vehicle trip rates for market rate multifamily housing that is low-rise and not close to transit (ITE code 221) as well as affordable multifamily housing (ITE code 223). While these rates do not account for trip length, they serve as a proxy for the expected difference in vehicle trip generation and VMT generation presuming similar trip lengths for both types of land use. If the user has information about trip length differences between market rate and affordable housing, then adjusting the percent reduction accordingly is recommended.[10]

Thus, neither CalEEMod nor the CAPCOA Handbook account for VMT reductions attributable to locating affordable units proximate to areas in which there is insufficient affordable housing for low wage workers.

C. Implementation of VMT mitigation through provision of affordable housing or affordable housing subsidies, as encouraged by AB 130 and by the MTP/SCS EIR, will require traffic modeling that is sensitive to location of affordable housing with respect to low wage jobs.

As the DEIR acknowledges, AB 130 establishes a Transit Oriented Development (TOD) Implementation Program that would fund, inter alia, affordable housing that is VMT efficient. Also, as the DEIR and AB 130 acknowledge, CEQA already permits local agencies to identify provision of affordable housing units as VMT mitigation. The AB 130 TOD Implementation program is intended to encourage this means of CEQA mitigation for significant VMT impacts. The California State Department of Housing and Community Development is expected to develop guidance by July 2026 to implement VMT mitigation, e.g., methodologies to determine mitigation contribution amounts,

to identify “location efficient areas” for affordable housing, and to validate VMT funding contributions and VMT reductions. (Public Res. Code, § 21080.44(d).)

The definition of location efficient areas suitable for VMT mitigation must reflect “a reasonable nexus between the location of the transportation impact of the project and the location of the vehicle miles traveled-efficient affordable housing . . . which shall consider the location efficient area’s consistency with an adopted sustainable communities strategy . . .” (Public Res. Code, § 21080.44(d)(2).) As discussed above, VMT reductions from the provision of affordable units are greater where the affordable units can redress a severe imbalance of low wage jobs and affordable housing. For example, even if the facilities for transit, alternative transportation, and active transportation were the same in Monterey and Salinas, provision of an affordable unit in Monterey would likely have more potential VMT reduction benefit than in Salinas because Monterey has a more severe low wage job to affordable housing imbalance than its provision in Salinas. So “location efficiency” should reflect both the facilities for transit, alternative transportation, and active transportation and the opportunity to reduce long commutes by addressing a severe low wage jobs/affordable housing imbalance. As a practical matter, this means that modeling of the VMT generated by the participating project (the development project under review) and the modeling of VMT by the mitigating project (e.g., the affordable units) must reflect information about the existing imbalance of low wage jobs and affordable units.

The DEIR’s Mitigation Measure TRA-2(a) proposes incorporation of affordable housing as mitigation for VMT impacts. As part of its mandatory Mitigation Monitoring and Reporting Program, AMBAG must be able to monitor the implementation and assess the efficacy of this mitigation.

The AMBAG Regional Travel Demand Model (RTDM) will likely be the model relied on in the AMBAG region to identify VMT impacts, to project the efficacy of VMT mitigation in future project reviews under CEQA, and to assess its actual efficacy in mitigation monitoring for the MTP/SCS. To support VMT mitigation via provision of affordable housing, the RTDM must be able to project and assess the benefits of locating affordable housing proximate to low wage job areas. It is unclear whether the existing RTDM has this capability and, if so, whether the capability was used in the preparation of the MTP/SCS. The questions in the next section are intended to address this.

II. Questions regarding the AMBAG Regional Travel Demand Model used to prepare the VMT analyses in the EIR

The RTDM was employed at the regional rather than the project level to support the MTP/SCS and its EIR. Regional VMT modeling without considering the match or mismatch between affordable housing and the location of low wage jobs cannot inform choices about where to locate affordable housing.

The choice of where to locate affordable housing is primarily up to local land use agencies because AMBAG has no direct land use authority. However, AMBAG does have an indirect effect on the actual build-out of local land use plans because AMBAG's MTP/SCS determines how to allocate funding for transportation projects, and the choice of transportation projects affects the viability of land use development. For example, the DEIR's alternatives analyses acknowledge that the additional investments in transit, active transportation measures, and complete streets can reduce VMT by encouraging dense, mixed use, infill development that would locate "the places where people work and live within urban centers and closer to transit" and support "a more compact growth footprint with higher densities in urban areas." (DEIR, pp. 7-17, 7-28.) VMT modeling that is uninformed by the locational relation of affordable housing and low wage jobs cannot inform those choices the MTP/SCS must make, i.e., whether and where to make the alternative transportation investments that tend to support the development of affordable housing. And, as discussed in the section above, VMT modeling to support AB 130 and to monitor the efficacy of the MTP/SCS mitigation must also be informed by the locational relation of affordable housing and low wage jobs.

DEIR Appendix F provides high level documentation of the RTDM and Land Use Model used for the MTP/SCS, but it does not make clear whether the RTDM has been used or can be used to assess the VMT reduction effects of locating affordable housing proximate to low wage jobs.

General statements of the goals for and data included in the RTDM may imply this capability. The RTDM goal is to "predict activity locations accurately, as they have a significant impact on all subsequent demand forecasting steps and resulting Vehicle Miles Travel (VMT)." (DEIR, p. F-4.) The goal is also to "answer policy questions at the level of individual and household characteristics such as age, gender, income, and auto sufficiency . . ." (Id.) One key point of the MTP/SCS process is to enable local jurisdictions to "better integrate transportation and land use decisions." (DEIR, p. F13.) "Evaluating the relationship between land use, urban form, and regional travel behavior in a scenario planning analysis produces several benefits," including locating complementary activities near transportation infrastructure. (DEIR, p. F-13.) This evaluation is useful because "[n]ew development locations, types, patterns, and intensities in an area could significantly improve transportation system performance without spending significant transportation dollars." (DEIR, p. F-13.) The acknowledgment that the "quantity and location of travel demand may be influenced by land use decisions..." implies that the modeling must be able to reflect these land use decisions. (DEIR, p. F-13.)

However, these general statements do not clarify the specific capabilities of the RTDM. Accordingly we ask that comment responses address the following questions.

A. Location of existing and planned affordable housing units

The model is based on a disaggregation of the Regional Growth Forecast by Traffic Analysis Zone (TAZ). (DEIR, p. F-10.) The disaggregation is supposed to reflect general plan assumptions for each jurisdiction, and the DEIR states that it does so. (DEIR, pp. F-10, E-4.)

The model is supposed to rely on scenarios constructed using Cal-Builds, which in turn includes “total number of housing units and affordable units.” (DEIR, p. F-10.) The modeling of the location and type of housing units and job locations is further described as follows:

The forecast disaggregation process at the TAZ level also takes into consideration local land use policies, county level parcel data, employment data procured from California Employment Development Department (EDD), 2020 Census, and 2018-2022 ACS 5-year estimates datasets for the base year 2022 land use allocation. The 2022, 2035, and 2050 scenarios for the MTP/SCS were developed using this population and employment forecast in consultation and collaboration with region’s local and regional agencies as well as using newly developed land use allocation model for the future years (2035 and 2050).” (DEIR, p. F-10.) Cal-Builds is supposed to provide “information of upcoming and recently built developments for both commercial and residential builds. For commercial developments, building size and by development types, use type, floor area (sq. ft.), and percentage of use by type. Also, for residential developments CalBuilds tool tracks total number of housing units and affordable units. Each entry has tracking of development by status (completed, in construction, planning, projected, unverified, and deselected) for both commercial and residential projects (Figure F-5).

(DEIR, p. F-11.)

Does the RTDM contain or use information about the location of existing affordable housing units?

Does the RTDM contain or use information about the location of planned affordable housing units?

Does the RTDM incorporate data on the planned location of affordable housing units set out in the adopted and draft 6th Cycle Housing elements for the cities and unincorporated areas in the AMBAG counties?

If not, for what jurisdictions is 6th Cycle information about the planned location of affordable housing units lacking in the model?

If 6th Cycle information is missing, does the model rely on 5th Cycle Housing elements? For which jurisdictions?

Is information about the existing or planned location of affordable housing units incorporated into the model or is it provided to the model through an available data set? If the latter, please identify the data set.

Is information about the existing or planned location of affordable housing units made available or incorporated into the model at the TAZ level? Is it provided at a more detailed level, e.g., by parcel location?

B. Jobs and wages data – individuals and households

The DEIR’s model documentation reports that the model incorporates employment data.

The forecast disaggregation process at the TAZ level also takes into consideration local land use policies, county level parcel data, employment data procured from California Employment Development Department (EDD), 2020 Census, and 2018-2022 ACS 5-year estimates datasets for the base year 2022 land use allocation. The 2022, 2035, and 2050 scenarios for the MTP/SCS were developed using this population and employment forecast in consultation and collaboration with region’s local and regional agencies as well as using newly developed land use allocation model for the future years (2035 and 2050).

(DEIR, p. F-10.)

Do the employment data include wage information?

If so, describe how the wages data are presented and/or stratified. (For example, US Census Department stratifies wages data into three levels in its Work Area Profile Analysis.)

Are employment and/or wages data disaggregated at the TAZ level? Are they disaggregated at more refined levels, e.g., parcel levels?

Are wages data incorporated or made available to the model at the household level, as opposed to the individual worker level? Note that the RTDM documentation states that the model is supposed to forecast travel “for a synthetic population that directly accepts land use model forecasts of key distributions of household (size, income) and person (age, gender, work status) demographics.”

(DEIR, p. F-6.)

C. Trip number and trip length determinations

Does the model assign a fewer number of daily trips to affordable housing than to market rate housing? If so, how is this trip generation assumption determined or substantiated?

Does the model assign different trip lengths to affordable housing than to market rate housing? If so, how are trip lengths determined for affordable vs. market rate units?

Does the model assign different trip lengths to affordable housing units based on their proximity to lower wage jobs? If so, how are these differing trip lengths determined?

D. High-density market rate housing and multi-family market rate housing

Even when it is not deed-restricted for lower income households, high density market-rate housing and multi-family market-rate housing may be considered “affordable by design” and may generate fewer and shorter trips where located efficiently

Does the model use different trip numbers for high-density market-rate housing or multi-family market-rate housing than for other other forms of market-rate housing? If so, how are these derived?

Does the model use different trip lengths to high-density market-rate housing units or multi-family market-rate housing units than to other other forms of market-rate housing?

Does the model assign different trip lengths to high-density market-rate housing units or multi-family market-rate housing units than to other other forms of market-rate housing based on their proximity to lower wage jobs? If so, how are these differing trip lengths determined?

E. Sensitivity

Sensitivity tests were performed, including tests that “[m]odify land use and job housing mix.” (DEIR, p. F-14.) It is not clear how the job housing mix was modified.

Did the job housing mix distinguish affordable housing from market rate housing?

If so, was the model sensitive to these changes?

Did the job housing mix distinguish low wage and high wage jobs?

If so, did the sensitivity test modifications include changing the mix of low wage and high wage jobs?

If so, was the model sensitive to these changes?

Appendix F reports that “the model is sensitive to some changes while not sensitive to others.” (DEIR, p. F-14.) Appendix F states that “[f]or those where the model is not sensitive, potential enhancements will be investigated and implemented in next update cycle and for this cycle, post-processing methods is included as appropriate in the section below.” (DEIR, p. F-14.)

Was the model sensitive to changes in the jobs housing mix?

What potential enhancements will be investigated and implemented for the next update cycle regarding the location of affordable housing and lower wage jobs?

What post-processing methods were included to assess the VMT effects dependent on the location of affordable housing and lower wage jobs? If no methods were used, what methods could have been used?

E. Calibration of model with Census Department Inflow/Outflow data

The Census Department provides the following data for inflow and outflow of commuters from selected cities in Monterey County for the 2022 baseline year.[11]

| City | Commutes into | Commutes out of | Lives/works in same city |
|-------------|----------------------|------------------------|---------------------------------|
| Salinas | 25,649 | 30,912 | 16,654 |
| Gonzales | 1,536 | 2,038 | 162 |
| Soledad | 1,996 | 6,675 | 730 |
| Monterey | 17,682 | 6,054 | 2,415 |
| Seaside | 3,634 | 9,545 | 818 |

Please provide the data used as input to the RTDM, and the forecasted output from the RTDM, for in-commutes, out-commutes, and no-intercity-commutes for these cities for the baseline year 2022 and the forecast years 2035 and 2050.

Please indicate whether these RTDM data inputs and outputs were consistent with the Census Bureau 2022 data in the table above. Does the level of consistency indicate adequate calibration of the RTDM to the Census data?

If the model does not adequately calibrate with the Census data, please explain why not and what implications this has for the accuracy of the 2035 and 2050 forecasts.

III. Questions and comments regarding DEIR’s VMT significance analysis

A. Claim that VMT impacts are not caused by the MTP/SCS project

The DEIR claims in the heading for “Impact TRA-2” that “the 2050 MTP/SCS would result in an increase to daily VMT per capita between the baseline 2022 conditions and the 2050 conditions. Per capita VMT impacts from implementation of the 2050 MTP/SCS would be significant and unavoidable.” (DEIR, p. 4.15-26.)

However, it appears that any projected VMT increase would not be caused by implementation of the MTP/SCS project because the DEIR states that the project itself has no effect on VMT and that VMT increases are attributable to “projected population growth.”

Table 4.15-5 shows that daily VMT per capita would increase from 20.9 to 22.4 miles by 2050, with or without implementation of the MTP/SCS due to projected population growth. As previously discussed, population growth in the region would increase daily total VMT, regardless of the potential implementation of the 2050 MTP/SCS. Compared to baseline conditions, the daily total VMT per capita in the region would increase by the year 2050 under implementation of the 2050 MTP/SCS, there would not be a reduction of VMT per capita that is 25 percent below 2019 VMT per capita conditions by 2030 or 30 percent below by 2045, and this impact would be significant.

(DEIR, p. 4.15-27.)

CEQA requires that an “EIR shall identify and focus on the significant effects of the proposed project on the environment.” 14 CCR §15126.2(a). Effects are considered significant only if “caused by the project.” (14 CCR § 15064(d) [The “lead agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project”].)

Please explain why the DEIR concludes VMT impacts are significant despite the DEIR’s attribution of the regional changes in VMT to causes other than the proposed project.

We note that the fact that the EIR’s VMT threshold of significance requires a finding of significance if VMT is not reduced from baseline conditions. However, the fact that VMT after implementation of the MTP/SCS does not attain this reduction cannot, by itself, be the basis of a significance finding if the same outcome would occur without the MTP/SCS. Again, significant impacts are those that are caused by the project under review, not those that would occur regardless of the project.

B. Relation of population growth to per capita VMT

The VMT significance analysis states that “daily VMT per capita would increase from 20.9 to 22.4 miles by 2050, with or without implementation of the MTP/SCS due to projected population growth.” (DEIR, p. 4.15-27.) It is not clear why total population growth would increase per capita VMT. The DEIR’s VMT analysis section does not provide population assumptions, but there is no necessary reason that aggregate population growth should affect per capita VMT. Please explain whether and why aggregate population growth is causally related to per capita VMT.

C. EIR’s projection of VMT for affordable and market rate housing

Please explain whether and how the VMT analysis accounts for differential VMT generation for affordable and market rate housing units. For example, does the VMT analysis project fewer VMT for affordable units? If so, is this reduction a consistent percentage or does it vary based on some other factor?

If the VMT analysis does project different VMT for affordable and market rate units, please explain whether the differential is accounted for solely based on different numbers of trips generated by affordable units or whether there are different assumptions regarding trip lengths.

Please identify any differing assumptions regarding the numbers of trips generated by affordable units and the source of those assumptions.

Please explain how trip lengths were forecast for market rate and affordable units and whether different trip lengths were projected for these types of units.

Please explain whether and how the model relates the proximity of jobs and housing units to trip lengths.

Please explain whether and how the model uses household income to project commute or other trip lengths.

Please explain how the model uses household income to affect its VMT projections.

Please explain whether and how the model uses the wage levels of proximate jobs to project commute or other trip lengths.

IV. Questions and comments about VMT mitigation monitoring

VMT Mitigation Measure TRA-2(a) includes a directive to implementing agencies when considering project approvals to “[i]ncorporate affordable housing into the project.” (DEIR, p. 4.15-29.) The purpose of this mitigation is to reduce VMT.

How will AMBAG’s Mitigation Monitoring and Reporting Program (MMRP) for the MTP/SCS assess the effectiveness of the incorporation of affordable housing into future project approvals?

Will AMBAG track development of affordable units in terms of numbers of units and location of units?

Will AMBAG’s monitoring somehow determine actual VMT for affordable units that are actually built or will it rely on modeling the expected VMT for affordable units that are built?

If the MMRP relies on modeling of expected VMT for built affordable units, will that modeling consider trip lengths as well as trip numbers for affordable units? How would trip lengths be measured or projected?

If the modeling ignores trip lengths, how could the MMRP distinguish effective affordable housing, e.g., a project located proximate to low wage jobs, from ineffective affordable housing, e.g., a project located far from low wage jobs? For example, if an inclusionary ordinance mandates provision of affordable units for a rural sprawl subdivision, the inclusion of these units far from

low-wage jobs, instead of locating them proximate to low-wage jobs, may exacerbate VMT rather than decreasing it.

If the MMRP relies on measurements of actual VMT for affordable units that are built, how will AMBAG make those measurements?

Will AMBAG use the Census Department's Inflow/Outflow analyses for commute data as part of the MMRP for VMT?

V. Questions regarding induced travel

A. Background

The DEIR acknowledges that induced travel, from, e.g., adding freeway capacity to 101 near Salinas, may occur because transportation projects to increase roadway capacity may result in increased VMT due to five factors. Those five factors include land use changes and various transportation choices that are induced by additional capacity. Specifically, the five factors are land use changes, longer trips, mode choice changes, route changes, and new trips. (DEIR, p. 4.15-27.)

The DEIR acknowledges that land use changes caused by adding transportation capacity are the most important of the five factors because land use changes can result in as much as half of the induced VMT. (DEIR, p. 4.15-28.)

B. Quantification and comparison of induced travel to a meaningful threshold of significance is required.

As noted above, the VMT changes that would occur with or without the MTP/SCS discussed under the heading “Per Capita Vehicle Miles Travelled” are not apparently caused by the MTP/SCS because the DEIR concludes that the MTP/SCS causes no change to the per capita VMT. However, induced travel from AMBAG’s choices to add capacity through the transportation projects planned in the MTP/SCS is in fact an impact caused by the MTP/SCS. Thus, this impact should be quantified and compared to a meaningful threshold of significance.

However, the DEIR does not quantify induced VMT from adding capacity. Without quantification of the induced travel caused by the MTP/SCS, there is no basis to compare this effect to a threshold of significance, even to one as ill-defined as the EIR’s induced travel threshold.

The EIR’s threshold of significance for induced travel is inadequate because it is simply opaque. The threshold of significance for induced travel is defined circularly as the question whether “[a] substantial increase in induced travel due to roadway capacity expansions would be considered a significant impact?” (DEIR, p. 4.15-26.) The circularity of this threshold (i.e., its logic that an impact is significant if it is “considered” significant) may be due to inartful drafting. The intent may be that the threshold is “substantial increase.” However, no metric is provided for what constitutes a “substantial increase.” There is no scientific or other basis for the adoption of this essentially meaningless threshold so it lacks a basis in substantial evidence.

And again, no measurement of the increase in induced travel is provided so no comparison of induced travel to the threshold is possible.

The failure to identify a meaningful threshold of significance or to quantify the induced travel due to capacity increases is an informational shortcoming in the DEIR. An EIR must identify a clear

standard for assessing significance and then must provide sufficient analysis to apply that standard to the project's effects. (*Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 654-55.) The analysis of significance should precede the consideration of mitigation measures so that alternative mitigation can be considered. (Id. at 655-56.) Project features should not be confused with mitigation measures. (Id. at 655-658.)

The DEIR should be revised and recirculated to provide a definition of "substantial increase," to justify the threshold, to quantify induced travel without any applicable mitigation, to explain whether and why pre-mitigation induced travel crosses the threshold of significance, and to propose any necessary mitigation.

C. Qualitative discussion of the significance of induced travel is inadequate

Although the DEIR fails to quantify induced travel or to compare it to a meaningful threshold of significance, it does provide a one-paragraph discussion of induced travel effects. That discussion is inadequate. We set out the discussion and objections below.

1. DEIR's qualitative discussion of induced travel

The DEIR's qualitative discussion of the significance of induced travel includes a short discussion of the land use change factor; a short discussion of four other factors; and a significance conclusion.

a. Land use change factor discussion

The discussion of the effect of induced travel due to land use changes caused by the MTP/SCS projects is as follows:

The 2050 MTP/SCS coordinates land use and transportation projects through the 2050 horizon year. The SCS is intended to identify a land use strategy that supports the objectives of SB 375 to achieve, among other things: increased roadway optimization, increased modes of travel other than single occupancy automobiles, increased access to jobs and amenities, minimized increases in VMT and reduced GHG emissions. Among the strategies to meet these goals is a mix of land uses balanced to minimize VMT and maximize the ability for residents and visitors of the region to conduct everyday activities without the need to travel by car. Consequently, the RTDM and associated transportation system performance results discussed in this analysis capture the effects of land use changes on overall travel demand in the region.

(DEIR, p. 4.15-28.)

b. Discussion of other four factors

The EIR then discusses the effect of the other four factors as follows:

Although the AMBAG RTDM does not specifically evaluate induced travel from the perspective of longer trips, changes in mode choice, route changes or newly generated induced trips, at the regional level these effects may be negligible compared to the overall amount of travel. As discussed in Deakin et al. 2020, induced travel is more pronounced at the project or corridor level, where changes in accessibility can lead to substantial shifts in travel behavior. However, at the regional scale, these effects are often diluted, as a portion of the total VMT growth can be attributed to induced travel from any single project. The report notes that “Corridor-level analyses pick up only a portion of the potential for induced travel” and that “induced travel can occur over a large area” but may take longer to appear in areas with slow growth or limited development pressure” (Deakin et al. 2020).

(DEIR, p. 4.15-28.)

c. Significance conclusion

The EIR then concludes its discussion of induced travel by drawing the following significance conclusion with respect to all five factors affecting induced travel:

Therefore, additional VMT resulting specifically from induced travel demand would not be substantial, and the induced travel impact at the regional level would be less than significant.

(DEIR, p. 4.15-28.)

2. Land use changes discussion inadequate

The discussion of induced travel from land use changes caused by the MTP/SCS transportation projects is inadequate for the following reasons.

There is no clear basis to find that induced travel due to land use changes caused by MTP/SCS transportation projects is less than significant. The claim that the MTP/SCS is intended to identify a land use strategy that minimizes VMT through mixed land uses and the claim that the effects of the land use changes are “captured” in the modeling does not tell us what those induced land use changes are, whether the strategy does in fact “minimize” VMT, or provide any basis to determine whether the induced travel from land use changes caused by the MTP/SCS projects is “substantial.”

Presumably the claim that induced land use changes are “captured” by the model implies that there is some mechanism by which the transportation system performance caused by the mix of transportation projects in the MTP/SCS induces changes to some initial set of land use assumptions. However, the EIR provides no information as to what land use changes would be caused by implementation of the MTP/SCS. That is, the reader cannot determine what land use aspects of the so-called “preferred land use scenario” are caused by the choice of transportation projects in the MTP/SCS and what aspects are independent of the project selection. That is, nowhere does the EIR explain what aspects of the “preferred land use scenario” are endogenous to the modelling, e.g., determined through the model or via some feedback mechanism, and what

aspects are exogenously determined, e.g., by reviews of general plans and the aspirations of planning directors.

Nor can the reader determine how much travel is in turn induced by the land use changes caused by the MTP/SCS. Telling the reader that the modeling “captures” the VMT effects of a particular set of land use projects and a particular set of transportation projects does not by itself demonstrate that the VMT effects have been “minimized” or are not “substantial.” The EIR offers not analysis but a black box.

For example, the public has no way to determine whether and by how much transportation projects to add capacity to US 101 and Highway 1 would cause more and faster buildout of sprawl subdivisions in the Salinas Valley for workers on the Monterey Peninsula or Silicon Valley, or to determine how much travel this would induce. That is, we cannot tell what land use changes the MTP/SCS causes or the travel effect of those changes.

By way of example, please identify the change in induced travel that would be caused by foregoing capacity improvements provided by each of the following projects:

- Russell Road Widening
- US 101 Salinas Corridor
- State Route 156 West Corridor Improvements
- Monterey County G12 Operational and Capacity Improvements
- Scenic Route 68 Corridor Improvements
- Davis Road Bridge Replacement and Widening and Imjin Parkway Widening project
- State Route 218 Operational Improvements
- Del Monte Corridor Improvements

Nor can the public discern whether and by how much the provision of increased transit, complete streets, and active transportation facilities would increase the buildout of denser housing and affordable housing on the Monterey Peninsula where jobs are located, or discern how much less travel this would induce. As discussed below, the EIR does purport to assess the provision of increased transit, complete streets, and active transportation facilities in Alternatives 2 and 3. However the discussion in the Alternatives analyses does not explain whether, how, or how much the change in transportation projects under Alternatives 2 and 3 cause changes to the preferred land use scenario, nor does the discussion provide any measure of the induced travel from these changes. It merely claims that induced travel in Alternatives 1 and 2 would be “reduced.” (DEIR, pp. 7-26, 7-37.)

Finally, as pointed out above, the EIR concludes that the MTP/SCS will have no effect on VMT because VMT per capita would be the same with or without the project. (DEIR, p. 4.15-27.) Given the earlier conclusion that the MTP/SCS has no effect on VMT, the claim in the subsequent

discussion of induced travel that the MTP/SCS “minimizes” VMT is not supported. If a project has no effect on VMT, it cannot reasonably be said to “minimize” VMT.

In sum, the discussions of induced travel due to land use changes caused by transportation projects in the preferred project or the Alternatives do not provide information to justify any findings about the significance of induced travel due to land use changes.

3. Other four factors discussion inadequate

The discussion of induced travel from the other four factors - longer trips, mode choice changes, route changes, and new trips caused by the MTP/SCS transportation projects – is inadequate for the following reasons.

The DEIR’s discussion commences with the admission that the modeling “does not specifically evaluate induced travel from the perspective of longer trips, changes in mode choice, route changes or newly generated induced trips.” (DEIR, p. 4.15-28.) Instead, the DEIR cites some generic literature, Deakin et al. 2020, for two apparently irrelevant propositions.

First, the DEIR claims that induced travel is “more pronounced at the project or corridor level,” by which the DEIR apparently means less “diluted” than induced travel appears to be when compared to the total level of regional travel. But the task at hand in this EIR is to determine the significance of induced travel at the regional scale. So whether total induced travel at the regional scale appears as “pronounced” as it might be in an analysis of a single transportation project is not relevant.

Indeed, the DEIR then admits that “corridor-level analyses pick up only a portion of the potential for induced travel,” because “induced travel can occur over a large area” and may take some time to appear. In effect, the DEIR admits that determination of the actual significance of regionally induced travel from the MTP/SCS should not be postponed to future analyses of specific transportation projects because those future analyses are incomplete.

And the fact that regional induced travel effects may take some time to appear is not relevant either. Any changes that do occur within the 2050 planning horizon should be assessed.

Regardless of the merits of the generic claims based on one piece of the literature made by the DEIR, the fact remains that the EIR makes no effort to assess the actual effect of the MTP/SCS on travel due to longer trips, changes in mode choice, route changes or newly generated trips induced by the MTP/SCS transportation projects. No effort is made to quantify this additional travel or to compare it to a meaningful threshold of significance. Once again, we have no idea how much additional travel might be due to provision of capacity on US 101 and Highway 1 that facilitates longer distance commuting and shopping trips, that encourages driving rather than transit, or encourages new trips that would otherwise have been foregone due to congestion.

What matters here is precisely the regional aggregate travel effect of added capacity, which has not been isolated or quantified. And regardless how long it takes to appear, it may still be significant when it does appear.

VI. Alternatives questions and comments

The alternatives should logically represent a changed version of the MTP/SCS, i.e., a changed mix of transportation projects. Since AMBAG has no land use authority, AMBAG cannot control the land use scenario except insofar as its choice of transportation projects causes changes to the land use scenario that is assumed to obtain otherwise, i.e., causes changes to the preferred land use scenario.

The alternatives analyses do not provide information about specific changes to the land use scenario. There are no maps or discussion of the specific land use changes that would be caused by altering the set of transportation projects to provide increased transit, more complete streets, and more active transportation facilities. Indeed, the DEIR does not even provide a specific list of the changes to the transportation projects that would be included in Alternatives 2 and 3 to provide that increased transit, those more complete streets, and those additional active transportation facilities.

The DEIR inaccurately claims that “[t]he alternative land use and transportation scenarios modeled and analyzed by AMBAG are described in Appendix F of the 2050 MTP/SCS.” (DEIR, p. 7-2.) We are unable to discern any description of either the land use assumptions or the MTP/SCS project lists for Alternatives 2 and 3 in Appendix F. The DEIR must be revised and recirculated to provide an adequate description of the Alternatives, and that description should identify the changes to the transportation project list and the changes to land uses that these transportation project changes cause.

Assuming that there was a disciplined process to develop a list of transportation projects for Alternatives 2 and 3 and to identify land use changes that would be caused by these alternatives, please respond to the following questions.

Does the VMT modeling for the Alternatives assume that the increased land use development density and increased incidence of mixed-use projects are in fact caused by the changes in transportation projects? Since this is the only variable that AMBAG controls, it should. The alternative description should not assume that land use changes are made exogenously, but the discussion implies that more compact and mixed land uses will somehow occur and then be served by a different mix of transportation projects. The DEIR does not explain how the land use scenarios for Alternatives 2 and 3 were developed or provide evidence that they were caused by provision of a different transportation mix. Please explain how the land use assumptions were developed and provide those assumptions in all available detail.

Provision of increased transit, more complete streets, and more active transportation facilities should encourage more high-density urban infill and should make affordable housing more feasible in urban locations and proximate to low wage employment. If the land use assumptions for Alternatives 2 and 3 were developed by determining how land use would be altered by a different mix of transportation projects, then it should have reflected changes in the location and pace of development of high-density housing and affordable housing. The location of development should be available by TAZ. The pace of development should be reflected in the counts of built units under 2022, 2030, and 2050 conditions in each TAZ.

Please provide the unit counts and location by TAZ for built high-density market rate housing, other market rate (non-high density) housing, and affordable housing for the years 2022, 2030, and 2050 in the preferred scenario and Alternatives 1, 2, and 3 for Monterey County. Please provide this information for each TAZ in tabular form or by electronic spreadsheet. Please provide a map of Monterey County with the TAZs overlaid so we can determine where the alternatives would affect land use.

Do the VMT analyses for the Alternatives account for changes to the jobs/housing mix due to better matching of local low wage jobs to affordable units?

Do the VMT analyses for the Alternatives account for changes to the jobs/housing mix due to better matching of local low wage jobs to higher density and therefore more affordable by design units?

Thank you for this opportunity to comment.

Regards,



Michael DeLapa
Executive Director

[1] AMBAG, RHNA, page 28, available at https://www.ambag.org/sites/default/files/2022-10/AMBAG_RHNA_2023-2031_Final%20Plan_091522_PDF-A.pdf.

[2] US Census Bureau, On the Map, 2022 data for City of Monterey, available at [OnTheMap](#).

[3] Id.

[4] AMBAG, RHNA, page 28, available at https://www.ambag.org/sites/default/files/2022-10/AMBAG_RHNA_2023-2031_Final%20Plan_091522_PDF-A.pdf.

[5] Gonzales, Housing Element, Sections 1-3, page 11, available at https://cityofgonzales1-my.sharepoint.com/:b/g/personal/epalmerin_ci_gonzales_ca_us/EWDWPBdUW2FNnYX3YVp8NrcBct13b_ms0M0Y7RlxRyKdeg?e=nlb2HO.

- [6] Gonzales, Housing Element, Sections 4-5, pp 74-75, available at https://cityofgonzales1-my.sharepoint.com/:b/g/personal/epalmerin_ci_gonzales_ca_us/EYzAe_vWJmRDtpZ6gxAB8hEBZ4GkoyULJ_oOx21Pr0Mxgg?e=ysnqNA.
- [7] US Census Bureau, On the Map, 2022 data for City of Gonzales, available at [OnTheMap](#).
- [8] Gonzales Housing Element, Sections 4-5, p. 86.
- [9] Id., p. 88.
- [10] CAPCOA, Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, 2024, p. 81, available at [Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity](#).
- [11] US Census Bureau, On the Map, 2022 data for listed cities, available at [OnTheMap](#)
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