

January 20, 2022

Ashley Paulsworth  
Sustainability Program Manager  
County of Monterey  
Monterey County Sustainability Program  
[climate@co.monterey.ca.us](mailto:climate@co.monterey.ca.us)

Dear Ashley and the Ascent Environmental consulting team,

LandWatch Monterey County has reviewed the draft Monterey County Greenhouse Gas Inventory Technical Report. We commend the County, the Ascent Environmental consulting team, and AMBAG staff for developing a rigorous, thoughtful, and comprehensive greenhouse gas inventory. In particular, we appreciate the sound approach for estimating emissions from fertilizer, as well as the detailed analysis – even if it was ultimately deemed out-of-boundary – for regulated stationary sources, as well as oil & gas emissions.

We have identified two substantive errors in the on-road transportation methodology that should be addressed. While we recognize that AMBAG's Regional Travel Demand Model will soon be updated to provide more accurate origin-destination data, it is important to nevertheless use the most accurate and timely estimate for on-road transportation until more granular data are available.

First, the inventory report (on page 17) describes the methodology as “using HPMS data for local roads within the unincorporated county,” and page 4 of the appendix lists the annual VMT as 639,028,260. However, the 2019 HPMS Public Road Data<sup>1</sup> lists 2,254,490 total daily VMT on local roads in Monterey County, which works out to 822,865,178 annual VMT – nearly 30% more VMT than used in the report. This mathematical error can hopefully be easily corrected.

Second, there is a methodological error in the HPMS data analysis. In the HPMS dataset, travel on state highways, which are not considered “local roads,” comprises

---

<sup>1</sup> <https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/california-public-road-data/prd-2019v3-a11y.pdf>

53% of all VMT countywide. However, under the “local roads only” methodology used in the inventory, these miles are *never* considered.

This is a very serious oversight. LandWatch has informed multiple agencies, including AMBAG, of the errors in continuing to use this approach. Although AMBAG has historically provided this “local roads only” approach for incorporated jurisdictions, which do not have highways within their territory, completely neglecting highway VMT is an unacceptable omission for the unincorporated county.

While waiting for full origin-destination data, the County must *at minimum* use a proportionate share of highway VMT to better estimate its overall share of countywide emissions. Using a population-weighted approach for allocating highway VMT (i.e., assigning a share of highway VMT proportionate to the unincorporated county’s share of the total county population), roughly 24% of the highway VMT would be assigned to the county, or another 1,447,803 daily VMT. This works out to a total of 1,351,336,981 annual VMT – 111% more VMT than originally estimated, and likely far closer to the values that will be generated from AMBAG’s updated model.

LandWatch believes it is critical the County use the best and most complete available data when estimating emissions, and as such it must consider highway VMT until an origin-destination model is available.

Last, while it is not the responsibility of the County or the consultant team, LandWatch was surprised to find that AMBAG has not provided the County with origin-destination data. Although the inventory report claims “the RTDM does not provide accurate data at smaller geographic scales, including the jurisdiction-specific level”, AMBAG has already completed its RTDM modeling for the 2045 MTP/SCS, including two separate origin-destination models, which are run at the Transportation Analysis Zone (TAZ) level that can be aggregated up into jurisdictions. We are concerned by the proposed delayed release of data until June 2022, and hope County and AMBAG staff can collaborate to provide complete origin-destination data as soon as possible.

Sincerely,



Michael D. DeLapa  
Executive Director