

## Comments on AHSC Guidelines and CARB Methodology for GHG Quantification

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The AHSC (Affordable Housing and Sustainable Communities) Guidelines and CARB (California Air Resources Board) methodology for GHG (Greenhouse Gasses) quantification are located at: <http://sgc.ca.gov/Grant-Programs/AHSC-Guidelines.html> . Below are comments from Sherman Lewis, President, Hayward Area Planning Association, [Sherman@csuhayward.us](mailto:Sherman@csuhayward.us) .

The document would benefit from editing by a college teacher of remedial English.

It makes a lot of sense to set a high threshold and then give points on top. The problem is that the points should reflect AHSC (AH and SC) goals and they don't always seem to.

### **More points for AH and SC.**

AH is simple enough; SC are more complicated. Details below.

### **GHG Quant**

My compliments to CARB and the GHG team for a very impressive combination of sophisticated analysis and transparency in using CalEEMod and a spreadsheet to try to make it all work.

My major recommendation is to study a different way of conceptualizing project GHG impacts. It could be developed by the ITS of the UC system. Instead of comparing projects to suburban emissions, i.e., as reductions in a suburban framework, which reduces differentiation among projects, instead estimate project emissions as such. Do not limit points using caps and overly simplified categories. For example, use project density, not putting it in some category of density. Do not estimate VMT reductions or put a cap on them; instead calculate project VMT per household or person. Calibrate a new model based on actual developments around the state from rural to urban core, over-sampling at the higher densities, including census block clusters with over 50 persons per acre. Don't just study why households buy and use cars; study those that don't, and oversample them. A new methodology would get rid of Table 2 p. 18 and just use the project itself and its primary travel area. Table 3 p. 20 has great policies, but is incomplete and artificially constrained and not project specific; a project/area based model is needed. Traffic calming yes/no? Too simplistic. (Step 4 should refer to complete streets, not just Table 3.) Such a model should be able to calculate non-linear decreases in VMT as various measures interact and reach economies of scale for mode shift. A new model could consider center and corridor area densification by the project to estimate systemic support for non-auto modes and VMT reduction. Step 4 p. 25 seems to have too few policies shown and uses simplistic inputs.

A new method would use model inputs specific to the project for the project itself and its primary travel area. Multi-variate models can use quantitative inputs specific to a project. Supplement parking supply by looking at auto ownership and VMT as a result of many variables

from the cost side-- parking cost from unbundling, neighborhood parking management/permit programs, and smart meters—and from the alternative mode side—walk score, existing bike use in primary travel area, transit across an array of service—circulators, shuttles, rapid bus, urban rail, public car use and availability. Look at more highly developed models from other fields, like the VA REACH model for suicide prevention and its STORM model for opioid treatment, since IBM's Watson may be unaffordable. The emissions factors equations are also the kind of thinking needed. The enormous amount of thinking that has gone into GHG Quant is still relevant for reorganizing how it is used for GHG estimation. As long as you calibrate to real projects and areas, you are on safe ground. All project can be ranked and points distributed across a continuum. The bin system dumbs down a more accurate system.

I suppose the existing state of knowledge means we have to keep using Table B-1 land use sub-types until we have an adequate “unified field theory” with a single way of managing all land uses.

### **GHG Quant and Quant Policy scoring**

GHG Quant and Quant Policy scoring should reinforce each other even at the risk of some duplication. I lack confidence that the GHG quant is sufficiently accurate to not be reinforced by points for policies that do the same thing. Quant policy now, in fact, does this for active transportation and traffic calming. GHG quant has limit parking supply, unbundling, and on-street market pricing of parking; quant policy should also. The Fig. 3 eligible cost example for traffic calming should be expanded to be consistent with GHG quant.

Public cars (car rental, car share, taxis, e-hail rides- Uber, Lyft) are ignored all around but are increasingly important. Why have bike share and not car share/rental? They may mean no need to own a car.

The more these two sections can use the same phrasing and reinforce each other, the better the evaluation works.

### **Program Guidelines**

**Figure 1.** The TOD/ICP/RIPA distinction does not seem useful. Eliminate TOD, ICP, RIPA columns? For rows 2, 3 and 6, use distribution requirements like in the last row: A housing 35/connectivity 35 split, urban area 70/rural 10; affordables 50/disadvantaged 50; with overlaps and remainders.

5 of 8 rows already go full across and the mix is confusing. What difference does high quality transit make? Let each proposal have its own concept of reducing GHG, VMT, transportation access and efficiency, job access etc. BRT has somehow survived your scrutiny, but it should not, when rapid bus is usually superior and BRT has few and expensive applications. Consider getting all of the mobility concepts out of Figure 1 and into eligible costs, scoring, and GHG quant. Don't have detail on specific means of mobility when the goals are what matter.

**Program** is used about 200 times with at least 18 meanings (as best I could tell), so it helps to always have an adjective in front, or at least close by. P. 4: are cap-and-trade program and GGRF program the same?

I suggest using “mobility programs” when intended because that is the only kind of program funded by the AHSC Program, judging from fig. 2.

### **Program vs. Program: Keep it clean**

It is important to keep the separation of capital costs and mobility program costs clean and consistent and generally you do.

But p. 46: “(oo) “Program Cost” means the cost(s) associated with 1) program creation, or 2) expansion of existing programs to serve new populations or offer new program service and implementation.” You don’t mean AHSC program costs; you mean mobility program costs. Same at (pp).

And p. 47: “(tt)... Qualifying Transit for the purpose of the Program includes various forms of fixed transit service...” You mean AHSC Program. I think. Ditto at (vv). Ditto at p. 48 (bbb) (2), (3) and (8). Does anyone check for consistent p/P capitalization?

p. 49” “(eee) “Sustainable Transportation Infrastructure” means capital project(s) that result in the...” You mean “Sustainable Transportation Infrastructure Project.” Infrastructure cannot contain a program, but a project can.

One ambiguity in Fig. 1: “AHSC Program funds MUST be used for Affordable Housing (which includes Affordable Housing Developments or Housing Related Infrastructure) AND at least one (1) other type of Eligible Capital Project or Program Cost” Same problem in next box. Same problem row 5 both boxes. You don’t mean AHSC Program Costs, do you? You mean mobility program cost. Another reason to revise/simplify/clarify Figure 1. Somewhere, at least, explain that program has different meanings.

P. 17 should say AHSC Program Threshold Requirements. Looks like a slip up in the usual terminology.

### **Eligible Cost Examples: Revise Fig. 3**

#### **You don’t need the columns.**

AHD/HRI has only one example which is already clear in Fig. 1. Delete.

There is no functional difference between STI and TRA. Start Fig. 3 with row 2 “Eligible Cost Examples for STI and TRA” followed by the list

Below those, “Eligible Cost Examples for PGM” and the list.

### **The map**

The concepts for map described on p. 26 d 2 need to be added to Fig. 3 to read “Development and publishing of community walking and biking maps, including school route/travel plans, grocery stores which meets the CalFresh Program requirements, medical clinics that accepts Medi-Cal payments, public elementary, middle and high schools, and licensed child care facility, and other destinations.”

### **Programs not eligible for PGM costs.**

Just to be clear here, the only eligible PGM costs are for Active Transportation Programs and Transit Ridership Programs. That means that points are awarded for other program costs that are not eligible for AHSC funds and must be funded some other way by project proponents.

Examples of ineligible program cost are green building certification programs (p. 24 c 1), resident displacement programs (p. 26 f 1), business displacement programs (p. 27 (2)), and workforce development programs (p. 27 g 1).

Calling something a strategy or policy doesn't really help does it? Nothing gets implemented by magic.

p. 32 (b) should be "other AHSC program..."

p. 42 Revise to read

(a) "Active Transportation Project" means Infrastructure Projects: capital improvements (construction of fixed facilities or permanent structural changes) that will encourage increased use of active modes of transportation, such as biking and walking.

(b) "Active Transportation Program" means programs which educate, encourage and plan to increase use of active modes of transportation, such as biking, walking, and instilling safe pedestrian, bicyclist and motorist behaviors to make safe active transportation possible. Active Transportation Program can stand alone or be included with Active Transportation Projects.

This mess inspired me to have you bring in a remedial English instructor.

### **Threshold vs. Scoring**

#### **Narrative-Based Policy Scoring p. 28ff**

I see a lot of staff discussions here. The narrative idea is well worth testing. For a new idea, however, I would not give it so many points, because as written the connection to AH and SC is too tenuous.

As phrased, the criteria seem too vague or irrelevant. Personally, I could not care less if a great project was achieved in an uncollaborative, unplanned way. It's like you are asking proponents, do you like motherhood and apple pie, and they will say, sure we do. Do you think some proponent will say oops, we don't have a community benefit, we better throw one in?

p. 28: "...only for projects that obtain over 50% of the Quantitative and GHG QM points." Why do you make people think so hard? Revise to "...only for projects that obtain over 40 points for Estimated GHG Reductions and Quantitative Policy." Reduce need for calculations and initialism interpretation.

**Collaboration & Planning.** These criteria should be part of the threshold, not points. These points don't seem to reflect AHSC goals; they are not in themselves AH or SC. You are rewarding people for what they should do in the first place. You can simply require consistency with plans and policies of local and regional government and housing and transportation agencies, and

some description of what proponents did to play nicely with others. The threshold already has a number of conformity requirements which could be beefed up. Additional detail could go into a separate reference document. A larger vision? What does that mean? You have a narrow vision until you talk to entities? Community-driven? Utopian nonsense. I've been in local politics since 1978. Leaders make things happen and the community reacts. I suggest revising to put basic ideas into the threshold, the detail into a separate document with other peripheral information, and get rid of feel-good, content-less rhetoric.

**Community Benefits & Engagement.** There is too much vague convoluted multisyllabic idealism here, a good idea getting lost in myth and rhetoric. It's like planners talking about vibrancy. The eyes of S. G. Council members will glaze over as you lull them into voting yes so they can wake up and return to real life. Get to the point. Collaboration and planning (above) has a sideways and upwards orientation while community education (here) has a downwards orientation to "the community," which really does not quite exist as a coherent entity, but is a mix of businesses, non-profits, advocates, odd balls, and don't cares/busy with other stuff. Your applicants will have no problem providing you with crucial, appropriate, authentic, identified, key, meaningful, engaged, creative, community-led, fed-back, purposeful, strong engagement.

Use simplified specific language, focus on engagement, and make it, or the basics of it, part of the threshold. Benefits should not be "multi-benefit projects that address community-identified needs" but something like "projects that benefit AH and SC."

Top p. 30 reworded: "Describe how local organizations and residents have been involved in planning this project, when they were engaged, and how their input has informed the project."

More ideas: Proponents should post information on the site of the project, hold public workshops, have work sessions with the planning commission and city council, provide contact info with address, email, web site, and phone #s six months or more before Planning Commission, take notes on public comments, and show responsiveness to comments that reflect concerns of many people.

### **Creating Sustainable Communities.**

This idea is more useful because focused on the goals of the program and allows a broader more coherent discussion than the quantitative policy scoring. Unlike AH, SC is much more complex and worthy of elaboration.

### **Page numbering**

Something wacky happens on p. 51; numbering reverts to -1- for no reason.

p. 49 (fff). You only have one reference to TCAC; just put the name there and delete this.