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**Subject:** Comments on the Draft LUSCAT Submission to CARB Scoping Plan on Local Governments, Land Use and Transportation

Panama

I enjoyed meeting you at the California Climate Action Registry. As we discussed, I have the following comments on the Draft Plan:

- The report should include specific recommendations on ways to measure actual Vehicle Miles Traveled (VMT) instead of modeling of VMT. Since you "can't reduce or manage what you can't or don't measure" it is important to include these recommendations in the report. As you know, agencies often differ significantly on VMT projections and even on actual miles travelled.
- One of the recommendations of ways to measure actual VMT could be through automobile odometer readings. I've had some preliminary discussions via email with Mary Nichols, Chairman of CARB, and she seemed receptive to this suggestion. Currently in California, cars older than six years old are required to receive a smog check every two years, which includes the recording of odometer readings. This information should be included in public records and odometer readings should be required for the "gap" years, those cars six years old or newer. This information will also help in instituting one of the other recommended programs such as "pay as you drive" insurance or regional VMT charges. The State could also require annual odometer readings and use the existing testonly smog stations to do so.
- Another way to measure actual VMT is a certification, subject to period audit, on the annual vehicle registration renewal form. Documentation, such as the odometer reading from a third party e.g. oil changes, tune ups etc. could be part of an audit. This data should also be kept in the public record.
- A high tech solution would be a GPStype system installed on cars.

Please let me know if you have any questions. Thank you.

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