

## Lockey, Heather@CNRA

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**From:** joshua blumenkopf <jblumenkopf@gmail.com>  
**Sent:** Wednesday, March 14, 2018 12:06 AM  
**To:** CEQA Guidelines@CNRA  
**Subject:** Don't Apply VMT to transportation projects

VMT minimization is a flawed procedure which can result in people sitting in congestion for hours with their cars burning gas, as long as they don't go far. VHT minimization is a much better benchmark. At any rate VMT should not be applied to transportation, as it would result in favorable numbers for building a wall to obstruct a freeway, and negative numbers for congestion management (through tolls, carpool lanes) that increase speeds.

Thank you,

Joshua Blumenkopf