



# COLORADO

## Department of Transportation

### REGULATORY ANALYSIS FOR RULES GOVERNING STATEWIDE TRANSPORTATION PLANNING

September 9, 2021

#### OVERVIEW

The proposed “Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions” will set a greenhouse gas standard for state and regional transportation plans. The purpose of the Proposal is to ensure ongoing greenhouse gas emissions reductions from Colorado’s transportation sector, which helps achieve the reduction goals set by HB19-1261. This rule also responds to a requirement in SB21-260, directing CDOT and the Transportation Commission to address GHGs through transportation planning.

C.R.S. 24-4-103 (4.5)(a) and (c) states that, “upon request of any person” the agency shall issue a regulatory analysis of the proposed rule, and the analysis “shall be made available to the public at least 5 days prior to the rulemaking hearing.” It requires the regulatory contain the following information:

1. A description of the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule;
2. To the extent practicable, a description of the probable quantitative and qualitative impact of the proposed rule, economic or otherwise, upon affected classes of persons;
3. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues;
4. A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction;
5. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule; and
6. A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule.

(b) Each regulatory analysis shall include quantification of the data to the extent practicable and shall take account of both short-term and long-term consequences.

Much of the information required in the Regulatory Analysis of this rule is contained in the more comprehensive Cost Benefit Analysis that CDOT has completed for this rule. The [“Cost-Benefit Analysis for Rules Governing Statewide Transportation Planning”](#) (CBA) may be found through the hyperlink provided.

**1. A description of the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule;**

The proposed rule is a transportation planning rule, and the implementers of the rule include the Colorado Department of Transportation (CDOT) and the five Metropolitan Planning Organizations (MPOs) in Colorado. This rule will positively impact the way transportation projects are planned for and selected in the state.

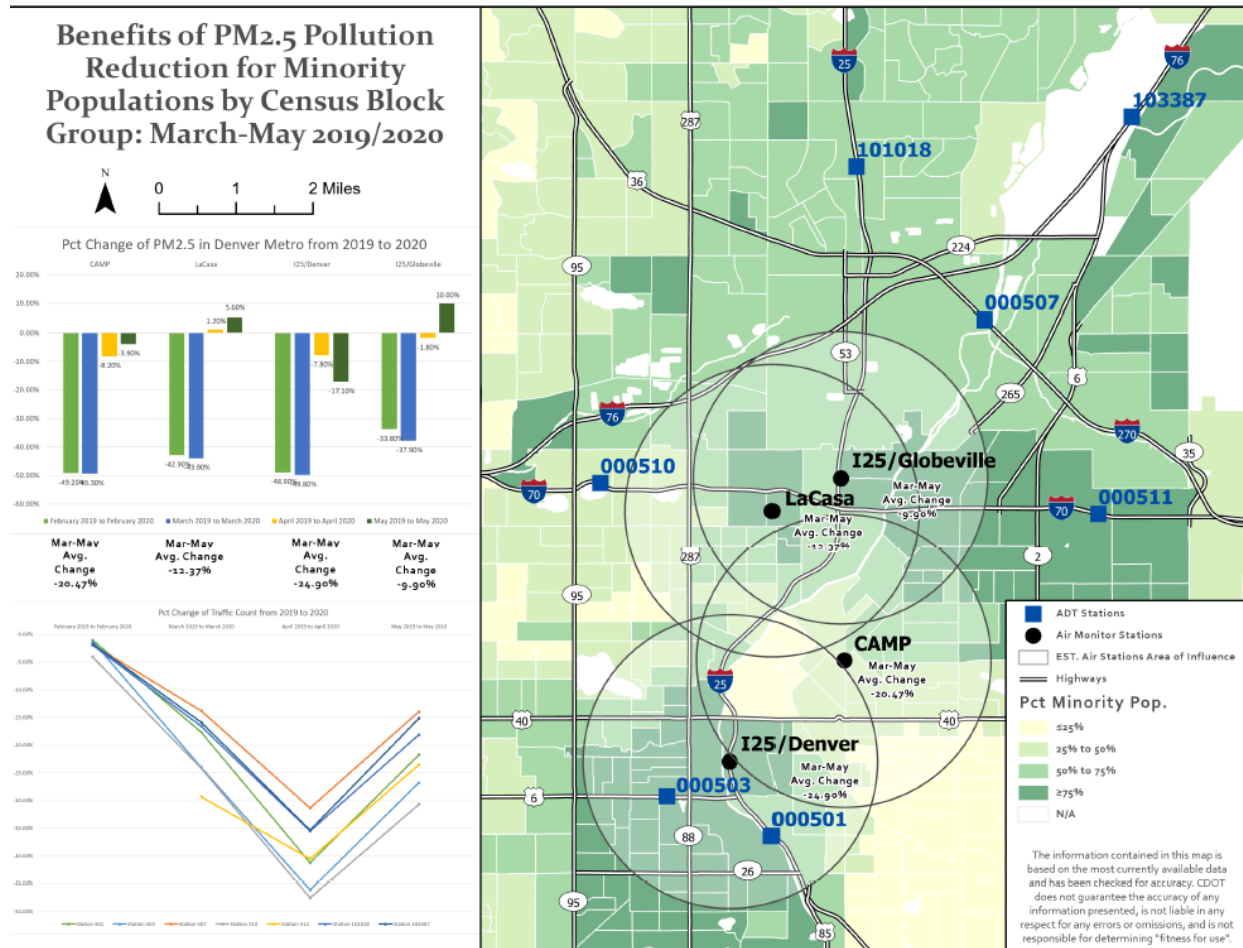
But more broadly, this is a statewide rule that will have an impact on transportation for virtually every class of individual in Colorado in some way, and the environmental benefits of the rule have a further benefit to persons living in Colorado. Because the rule is expected to shift some amount of funds to multimodal options, the rule has a particular benefit to individuals that must rely on a well constructed and maintained transit system. This includes disproportionately impacted communities.

Further, by reducing Greenhouse Gas (GHG) emissions and abating climate change, the rule will have an even greater positive impact on Disproportionately Impacted (DI) communities as those communities generally face a greater impact from climate change. This is well documented in studies and reports, including the following:

- “Populations including older adults, children, low-income communities, and some communities of color are often disproportionately affected by, and less resilient to, the health impacts of climate change.” Source: [The Fourth National Climate Assessment](#).
- “Minorities are most likely to currently live in areas where the analyses project the highest levels of climate change impacts with 2°C of global warming or 50 cm of global sea level rise.” “Those with low income or no high school diploma are approximately 25% more likely than non-low income individuals and those with a high school diploma to currently live in areas with the highest projected losses of labor hours due to increases in high-temperature days with 2°C of global warming.” Source: [EPA’s Climate Change and Social Vulnerability in the United States](#).

Work in Colorado also has demonstrated the local, disproportionate impacts on communities due to climate change. The Colorado Department of Public Health and Environment has developed a [climate equity data viewer](#) that uses population and environmental factors to calculate a climate equity score for every census block group in Colorado. A higher value indicates a worse score.

Another way to consider this question is to consider the co-benefits of this rule to air quality. Efforts that reduce GHGs from transportation also directly reduce other emissions, including particulate matter and ozone precursors. The map below shows the proximity of minority neighborhoods in the Denver metro area to interstate highways. This graphic also shows the reductions in fine particulate matter as measured by air quality monitors during the height of the Covid outbreak (a period of less vehicle travel) as compared to a pre-Covid time period.



Source: CDOT GIS Analysis

Additionally, this rule will provide additional benefits to multiple groups of transit-dependent individuals. According to the 2010 Census, 41.8 million Americans over age 18 were persons with disabilities, 40 million were over the age of 65, and 32 million were living below the poverty level (poverty level for people above age 18). Currently, DI communities are more likely to have limited access to high quality and efficient transportation either through transit or in a personal vehicle. Many of the individuals cited in the above census data are also totally dependent on transit due to physical abilities or age. The study "[Transit Deserts: The Gap Between Supply and Demand](#)," reflected that these populations are often marginalized and are especially vulnerable if their access to jobs, goods, and services is restricted. High quality and easily

accessible modes of transportation- frequently transit- are especially important to protect and elevate these populations.

A [2015 study](#) from Harvard found that Individuals who do not have reliable access to any type of transportation mode struggle to reach jobs and services and as a result their opportunity for upward economic mobility is limited. DI individuals who lack reliable transportation are more likely to be unemployed or underemployed with more chronic health issues. The Colorado Health Institute [examined](#) transportation disparities and its negative impact on individuals trying to access preventative as well as acute care. 5.5% of Coloradoans reported difficulty getting to doctor's appointments because they were not able to find transportation. According to the [American Hospital Association \(AHA\)](#), transportation challenges prevent more than 3.6 million Americans from receiving medical care each year. Increasing access to more modes of travel will improve community equity and health through cleaner air, higher wages, and better access to healthcare services.

**2. To the extent practicable, a description of the probable quantitative and qualitative impact of the proposed rule, economic or otherwise, upon affected classes of persons;**

There are a number of expected impacts of the rule, both quantitative and qualitative. Many of these impacts are benefits that accrue to businesses and individuals alike (e.g. a reduction in crashes leads to less lost work time). Listed below, and detailed further in answer #4, is a description of some of those impacts. Additional detail on the assumptions underlying these estimates of economic impacts is provided in Appendix A of the Cost Benefit Analysis.

Table 1 shows the projected change in social costs through 2025, 2030, 2040, and 2050 respectively, for full implementation of the proposed rule using the illustrative mix of strategies. The net benefits reflect the effects of reduced highway investment as well as increased investment in GHG-reducing projects. Negative values (shown in parentheses) represent a net cost savings. Future savings are discounted at a rate of 2.5 percent, consistent with Colorado Senate Bill (SB) 21-260 which requires use of the social cost of carbon dioxide (CO<sub>2</sub>) and other pollutants using a discount rate of 2.5 percent or less. The most substantial benefits are from reduced crashes and reduced vehicle operating costs, resulting from reduced VMT. The net present value of total social benefits is roughly \$8 billion in the 2026-2030 timeframe and \$17 billion between 2031 and 2040.

**Table 1**  
**Economic Benefits (Cost Savings)**  
**(Net Neutral Investment Levels after Mode Shift )**  
**(net present value, millions of 2021 dollars)**

<b>Timeframe</b>	<b>Vehicle Operating Cost</b>	<b>Social Cost of Carbon</b>	<b>Air Pollution</b>	<b>Safety (Crashes)</b>	<b>Traffic Delay</b>	<b>Physical Inactivity</b>	<b>Total Social Cost Savings</b>
<b>2022 - 2025</b>	\$(372)	\$(60)	\$(21)	\$(481)	\$(774)	\$(17)	\$(1,724)
<b>2026 - 2030</b>	\$(1,781)	\$(258)	\$(82)	\$(2,332)	\$(3,098)	\$(75)	\$(7,626)
<b>2031 - 2040</b>	\$(4,670)	\$(589)	\$(125)	\$(7,183)	\$(4,693)	\$(237)	\$(17,497)
<b>2041 - 2050</b>	\$(4,210)	\$(323)	\$(42)	\$(9,027)	\$397	\$(289)	\$(13,494)

A brief description of each of these economic benefits and how they were quantified is provided below. With the exception of physical inactivity, which is related to increased bicycling and walking, all of these economic benefits are derived from reductions in VMT and/or traffic delay.

- Vehicle operating cost – Fuel and maintenance costs per mile driven. Costs per mile change over time consistent with projected changes in fuel prices and the mix of the vehicle fleet including conventional fuels (e.g. gasoline and diesel) versus zero emission vehicles (e.g. electric and hydrogen). Vehicle cost savings provide travelers with more out-of-pocket money that they can spend on other goods and services of higher value to them. Businesses also save money for work travel and goods movement expenses. These savings benefit the state’s economy.
- Social cost of carbon – Global climate change is expected to result in a variety of negative economic effects to the world and national economy, including Colorado. Examples include costs of flood prevention and mitigation, health care costs associated with excessive heat, and fire prevention, control, and damages. Carbon emissions are valued based on guidance issued by the Biden Administration at a discount rate of 2.5 percent, consistent with Colorado Senate Bill (SB) 21-260. The social cost increases over time, from \$83 per metric ton of CO<sub>2</sub> emissions for emissions occurring in 2025 to \$116 per metric ton of CO<sub>2</sub> for emissions occurring in 2050.
- Air pollution – Costs associated with air pollution include higher health care costs, as well as damage to structures and natural systems. Values per ton of particulate matter

(PM) and oxides of nitrogen (NOx) reduced are based on modeling conducted in support of Federal rulemakings on vehicle tailpipe emission standards.

- Safety (crashes) – Costs associated with crashes resulting in fatalities or injuries include higher medical costs, insurance costs, vehicle property damage, and lost workplace productivity. These costs impact Colorado’s economy. Motor vehicle crash reductions are estimated based on national average fatality and injury crash rates per VMT, and are valued based on federal guidance on the value of a statistical life and average value of injury crashes.
- Traffic delay -- Traffic delay results in increased travel time for “on-the-clock” business travel and freight movement, as well as more time spent traveling for commuting, errands, and other personal travel. These time losses negatively impact Colorado’s economy. To estimate delay reduction associated with emissions-reducing transportation investments, hours of traffic delay reduced (per VMT reduced) are derived from Texas Transportation Institute studies of national traffic congestion and mitigation measures including transit expansion. For highway capacity expansion projects, which reduce delay, hours of delay reduced are based on modeled relationships between volume, capacity, and travel time. Capacity expansion projects consider the effects of “induced demand”, or increased traffic that is observed to result over time after roads are expanded. This increased traffic may lead to net increases in greenhouse gas emissions as a result of the project, and may offset to some degree the delay reduction benefits.
- Physical inactivity -- A lack of physical activity is associated with increased mortality and other negative health outcomes, increasing health care costs. Investments in walking and bicycling infrastructure and transit services increase physical activity, reducing those associated costs. Physical inactivity in this analysis is valued based on health care cost savings per mile of walking and bicycling activity.

Additionally, there are several categories of benefits from mitigation measures that are real, and may be quite large, but are difficult to quantify and therefore are not reflected in the Cost Benefit Analysis. These include:

- Reduced vehicle ownership costs - to the extent that areas comply with the GHG requirements by making land use decisions that reduce the need to travel long distances, make areas more walkable and bikeable, and add transit service, it is likely that this will enable more households to reduce their vehicle ownership, for example going from from a 2 car to a 1 car family. This is particularly true for land use changes, where there is a strong correlation between average number of vehicles per household and land use types. While the analysis above captures reduced vehicle operating costs, it does not capture the reduced costs from lower levels of vehicle ownership, including depreciation of vehicle value due to reduced use per vehicle owned, lower cost due to owning fewer vehicles, etc.. Nationwide, researchers have found that households within 1/2 mile of transit stations own on average 0.9 cars, while households in the rest of the metropolitan regions owned, on average, 1.6 vehicles. According to AAA, the annual fixed cost to own a vehicle - including depreciation, insurance, license and registration

fees, and finance charges - was on average \$6,200 in 2019, though these costs can range based on the cost and type of the vehicle, and household size.

- Downtown/main street economic revitalization - policies that support dense, walkable downtowns and main streets tend to spark significant economic vitality in those areas, providing customers for restaurants and small businesses. Investments in transit also spur economic benefits such as increased property values and agglomeration benefits from more efficient land use. These benefits are real, but difficult to quantify and are not included in this analysis.
- Increased access to jobs - Because Colorado already has a very complete roadway network, households that have access to cars have the ability to access employment by driving. By contrast, for residents who do not own cars or have disabilities that preclude driving, many jobs are essentially inaccessible. A more robust transit network will increase access to jobs for these residents, and will provide a larger pool of potential employees for businesses. As an example, within the DRCOG region 6% of households do not have cars and 9% of residents have mobility disabilities. While it is not quantified in this analysis, greater access to employment for these individuals could bring significant economic and equity benefits.

### **3. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.**

In terms of regulatory implementation, one reason why the Transportation Commission, rather than the Air Quality Control Commission, is pursuing this rule is in order to optimize overhead and streamline implementation resources within the organizations that already house transportation planning functions and expertise.

However, there will be some administrative costs associated with implementing this policy change, especially within the initial years of implementation. Within the state, the Colorado Department of Transportation (CDOT) is largely relying on existing staff positions to support the Transportation Commission's rulemaking, however, CDOT expects to hire three new positions to focus on functions related to implementation. This likely amounts to a cost of up to \$350,000 per year including employee benefits and other costs. Over time, it is possible that the Colorado Department of Public Health and the Environment's Air Pollution Control Division could hire an additional staff modeler to support confirmation and verification of pollution reduction analytics. This cost would amount to roughly another \$125,000-\$150,000 (including benefits).

Moreover, it is expected that some metropolitan planning organizations (MPOs) may require additional staff members dedicated to emissions modeling, as well as additional modeling software. CDOT is exploring options to streamline these overhead expenses and achieve economies of scale, especially as relates to centralizing certain modeling and software capabilities for use as shared services between the state and MPOs. The recently passed state legislation, SB 260, updates the Multimodal and Mitigation Options Fund (MMOF) to allow funds directed into this program to be used for modeling support.

#### **4. A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction.**

The following sections summarize a cost/benefit analysis assuming full implementation of this rule. This complete work is provided in the rule [docket](#). As described in this analysis, because changes in transportation investments are assumed to be absorbed into current transportation plan budgets, the projected costs of the rule are limited to agency administrative costs (new staff) and some costs to the two industries directly affected by reductions in VMT -- gasoline and diesel sales and automotive maintenance and repairs. Logically then, these costs, if assumed to be avoided, become the “benefits” of inaction. Likewise, the costs of inaction are best represented by the benefits if the rule is not implemented. The dollar value of these benefits is summarized in Table 1 above.

##### Summary of the Costs and Benefits of Rule Implementation

Full implementation of this rule is expected to result in significant economic benefits in the form of cost savings to travelers and to the general public. Travelers will benefit from reductions in vehicle operating costs as a result of expanded travel options (e.g., transit service, tele-travel, walking and bicycling), travel time savings, and the need to use personal vehicles less because of being provided with more options through state and regional transportation planning. Implementation of the rule will also reduce economic costs associated with carbon emissions, air pollution, motor vehicle crashes (road safety), and the health consequences of physical inactivity.

Businesses are also expected to receive a share of the economic benefits. Examples include congestion reduction that saves travel time for “on-the-clock” business travel, and reduced health care costs for employees as a result of reduced air pollution, motor vehicle crashes, and physical inactivity. They may also experience increased worker retention and satisfaction as a result of employees having expanded commute or work from home options.

Additionally, policies that facilitate and reward downtown density tend to have a markedly positive impact on “main street” small businesses such as restaurants and locally-owned retail. While these benefits can be somewhat difficult to quantify in the aggregate and are thus not fully accounted for in this analysis, results from the Colorado Department of Transportation’s “Revitalizing Main Street” program indicate that they are significant and widespread across the state. Well over 100 grants awarded to more than 70 communities have largely supported projects including downtown street repurposing and parklets, sidewalks and crosswalks, park and street improvements, shared streets between cars and pedestrians, and wayfinding and signage improvements. Many recipients have affirmed to CDOT that these grants significantly improved business and saved jobs during the COVID-19 pandemic, and, when surveyed, 67 percent of respondents said they would not have implemented these innovations without the program. Though grants supported many projects on a pilot basis, survey results showed that 81 percent of projects are likely to be maintained or repeated on a seasonal basis given their success. This data provides qualitative indication of the economic development benefits associated with many of the project types that this policy would encourage.



As indicated above, Table 1 shows the projected change in social costs through 2025, 2030, 2040, and 2050 respectively, for full implementation of the proposed rule using the illustrative mix of strategies. The net benefits reflect the effects of reduced highway investment as well as increased investment in GHG-reducing projects. Negative values (shown in parentheses) represent a net cost savings. Future savings are discounted at a rate of 2.5 percent, consistent with Colorado Senate Bill (SB) 21-260 which requires use of the social cost of carbon dioxide (CO<sub>2</sub>) and other pollutants using a discount rate of 2.5 percent or less. The most substantial benefits are from reduced crashes and reduced vehicle operating costs, resulting from reduced VMT. The net present value of total social benefits is roughly \$8 billion in the 2026-2030 timeframe and \$17 billion between 2031 and 2040.

Anticipated Costs

The answer contained in item #3, above provides an analysis of agency implementation costs, which reflect additional FTE that will be necessary to comply with the rule. The resulting transportation planning changes are net neutral -- representing some shift in how dollars are prioritized rather than an overall change in the amount of spending on transportation. For example, some, but by no means all, dollars would shift from highway capacity expansion projects to other types of transportation investment including but not limited to bus rapid transit lanes or queue jumps as part of road projects; walking and bicycling facilities; additional transportation services, including expanded transit service and ridesharing options; and/or consumer incentives to reduce travel or encourage travel by more efficient, lower-emissions modes (such as ridesharing or telecommuting incentives). Importantly, it is anticipated that all costs shifted towards these types of investments will themselves result in mobility benefits and economic development, as well as improvements to air quality and pollution reduction.

Importantly, as detailed in Table 2, it is assumed that only a portion -- roughly a quarter to a third -- of capital program dollars are shifted towards projects that also serve as mitigation, in addition to providing mobility benefits of their own. This means that the most critical capacity projects are assumed to advance, likely paired with mitigation and significant investment in achieving and maintaining a state of good repair for roads, bridges, tunnels, and other transportation infrastructure assets across Colorado.

**Table 2**  
**Net Neutral Investment Levels and Dollars Shifted to Multimodal Transportation and other Environmentally Beneficial Transportation Investments**  
 (net present value, millions of 2021 dollars)

Years	Total RTPs + 10-Year Plan	Total Shift to Mitigation	Percent Shift
2022-2025	\$3,842.07	\$417.90	11%
2026-2030	\$4,802.59	\$974.90	21%
2031-2040	\$9,605.17	\$2,655.80	28%
2041-2050	\$9,605.17	\$2,691.50	28%

It is worthy of note that additional federal investment could augment overall resources, and especially those resources geared towards transit and multimodal investments. For example, the Senate-passed Infrastructure Investment and Jobs Act would expand transit formula funds over the next five years by about \$39.5 billion, a 43% increase over the FAST Act. Under current FTA funding formulas, Colorado could receive more than \$900 million over the course of 5 years, an increase of approximately \$40 million a year. The Act also contains \$66 billion for Amtrak while Colorado continues to work towards passenger rail along the front range.

Businesses are not expected to incur significant direct costs to comply with the rule under the proposed implementation of the rule. As noted previously, there are a variety of social benefits (cost savings) that will be realized by the rule, some of which will accrue to Colorado's businesses. Importantly, this rule does **not** require that businesses implement trip reduction strategies that would have been required in a separate rulemaking recently withdrawn by the Air Quality Control Commission (AQCC). While businesses are encouraged to pursue employee trip reduction on a voluntary basis, and MPO's and CDOT through their Travel Demand Management (TDM) programs are able to help and encourage businesses in this effort, nothing in this rule requires it.

Lastly, both the benefit and cost assumptions within the rule assume that implementing agencies come into full compliance with the rule over the period of performance. However, the way that the rule is structured, the enforcement mechanism for non-compliance requires that a portion of an agency's capital funds -- which for MPOs are only those funds sub-allocated via the state as well as those specifically noted in Senate Bill 260 as being conditioned in this manner -- become restricted to projects that are demonstrated to reduce pollution and improve mobility. The recipient retains discretion over what pollution reducing investments are made, so long as those investments are approved as mitigations pursuant to the process set forth in the proposed rule. No entity would lose funds as a result of the enforcement provisions becoming effectuated by not hitting the targets in totality. The goal of this policy is to perpetuate serious conversation and planning for how the choices that planning entities make can provide consumers with the choices that are needed to reduce pollution and improve quality of life, not to diminish the ability of any entity to invest these dollars in mobility solutions for Coloradans.

#### **5. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.**

Earlier this year, Colorado released its [Greenhouse Gas Pollution Reduction Roadmap](#), which provides multiple strategies to meet the state's climate targets in 2025, 2030 and 2050. The Roadmap, which found that transportation is now Colorado's largest source of GHG emissions, listed multiple measures within the transportation sector to reduce emissions. One of those actions is to make transportation planning, investment and land use planning changes that provide more travel choices for Coloradans. That is what this rule attempts to do. It works to accomplish a share of the overall pollution reduction target for transportation with a new planning standard that refines the roles of the state and regional governmental agencies that are already in charge of transportation planning, making the implementation of the rule

unobtrusive to everyone that does not already have a governmental role in overall transportation planning.

Further, the rule does not place requirements on individuals, the traveling public, or businesses. The rule is expected to reduce GHG by utilizing existing transportation funds programmed by government entities to expand multimodal transportation options such as transit and bicycle commuting for consumers to choose from, while still increasing road capacity for the most critical corridors where it makes the most sense.

Lastly, it is worth noting that this rule complies with a direct requirement in SB260 directing CDOT to implement GHG requirements for transportation planning.

**6. A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule.**

An important aspect of this rule is that it does not require a specific set of measures to be implemented by the State and its MPOs to achieve the rule's targets. Those decisions are left to the implementing agencies who will also have ongoing opportunity to propose new mitigation measures for modeling to ensure that they result in emission reductions. Thus, in order to conduct this analysis, CDOT developed illustrative policy choice packages that assume implementation of three broad categories of VMT reduction measures: (1) expansion of transit service; (2) policies to encourage compact land use that reduces the need to drive by making it possible for travelers to access more of their preferred destinations easily within denser areas, in a manner that also facilitates strong and economically vibrant downtowns; and (3) various programs that expand travel choices through a variety of different approaches that could include investing in bicycle and pedestrian infrastructure and micro mobility services that assist with "first and last mile" connections to transit facilities; investments (e.g. in digital infrastructure) that help support tele-travel as an alternative to physical travel and also offer more workplace flexibility to employees in many work environments; or programs that encourage non-work travel by modes other than a single occupancy vehicle (e.g. a jurisdiction that provides transit passes to its residents).

Two specific alternative methods for achieving the purpose of the proposed rule were considered, including:

Alternative 1: A lower level of pollution savings based on modeling assumptions that only factored in savings associated with travel choices: Programs to encourage non-work travel by non-single occupancy vehicle modes; programs to support and encourage tele-travel (e.g., on-line health care, education, and shopping) as a substitute for physical travel; investment in bicycle and pedestrian infrastructure and micromobility services; and reduction of transit fares. Essentially, this regulatory alternative achieves the lowest cumulative pollution reduction targets and assumes fewer illustrative choices by agencies to meet them.

Alternative 2: A pollution reduction scenario at a level where the model assumed an illustrative set of actions including travel choices and expanded transit service. Notably, since most of the costs assumed in the rule relate to the ongoing cost of transit operations, this scenario would reflect most of the costs associated with the current proposal.

In contrast to the illustrative package of policy choices used to evaluate the proposed rule, these alternatives do not include additional land use policies to reduce vehicle travel. As a result, they are less likely to achieve the required greenhouse gas reduction targets and therefore to support overall state goals for GHG reduction and climate change. Once again, none of these scenarios prescribe specific choices for regulated entities, rather they establish stringency levels based on illustrative modeling options that contemplate various orders of magnitude.

The economic benefits (reductions in social costs) from these alternatives are presented in Table 3. The “travel choices” alternative (Alternative 1) achieves the lowest greenhouse gas emission reductions. The “travel choices + transit” alternative (Alternative 2) results in additional social cost savings and greenhouse gas reductions. The proposed alternative for this rule (which includes travel choices, transit, and land use policies) results in a further increase in greenhouse gas benefits. These considerations resulted in proposing this alternative to analyze the effects of the final rule. As with the base alternative, the net costs of implementing the rule to the public sector would assume similar levels of overhead (staffing) at implementing agencies but would otherwise assume that topline funding remains the same with some portion shifted from planned highway expansion into other, emissions-reducing modes and services.

**Table 3**  
**Net Present Value of Economic Benefits (Cost Savings) for Alternatives (\$millions)**

<b>Scenario</b>	<b>Alternative 1: Travel Choices</b>	<b>Alternative 2: Travel Choices + Transit</b>
2022 - 2025	\$(1,527)	\$(1,644)
2026 - 2030	\$(6,776)	\$(7,268)
2031 - 2040	\$(14,852)	\$(16,102)
2041 - 2050	\$(10,603)	\$(11,397)