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November 15, 2016

Ms. Jillian Wong
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Draft 2016 Air Quality Management Plan Program Environmental Impact Report

Dear Ms. Wong:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to provide comments on the Draft 2016 Air Quality Management Plan (AQMP) Program Environmental Impact Report. In addition, OCTA appreciates your diligent efforts to include a wide variety of stakeholders in your process as the 2016 AQMP is developed. In reviewing the Draft Program Environmental Impact Report (PEIR), OCTA identified several environmental impact areas that would benefit from additional clarification or further analysis prior to the certification of the Final AQMP Environmental Impact Report (EIR). These concerns are outlined in the discussion below.

As you know, the direct or indirect effects of a project on the environment should be identified and described, with consideration given to both short- and long-term impacts. The discussion of environmental impacts may include, but is not limited to, the resources involved; physical changes; alterations of ecological systems; health and safety impacts caused by physical changes; and other aspects of the resource base, including water quality, public services, etc. Because the environmental analysis accompanying the AQMP is a Draft PEIR, the analysis is broad and often cannot calculate and quantify environmental impacts to the detail needed to make findings. Therefore, OCTA requests that further California Environmental Quality Act (CEQA) analysis be conducted (whether by the Southern California Air Quality Management District {SCAQMD} or the California Air Resources Board {CARB}) related to the individual control measures as they undergo the rulemaking process. We specifically request a subsequent analysis of ORHD-04 – Advanced Clean Transit and EGM-01 – Emission Reductions from New Development and Redevelopment Projects.

ORHD-04 - Advanced Clean Transit

The CARB's Advanced Clean Transit Regulation is included in the AQMP. This regulation is intended to ensure that nearly every heavy-duty vehicle operated in California in 2023 will meet the 2010 heavy-duty engine emission standard. However, even a highly aggressive full-fleet penetration of 2010-compliant engines would not provide sufficient nitrous oxide (NOx) reductions to attain the federal ozone standard in the timeframe required.

This proposed rulemaking also requires transit operators to replace their entire bus fleets with zero-emission technologies between 2018 and 2040. There is a significant investment required as a result of this measures for very little emission reductions (less than 200 pounds of NOx per day). The emission reduction calculations for this measure need to be provided along with the fleet inventory assumed and fleet turnover projected. Without critical inputs, OCTA is unable to replicate the emission reductions associated with this measure.

It appears that the Draft 2016 AQMP assumed that the South Coast region's fleet is comprised of 11,000 buses, each traveling approximately 16,000 miles per year. However, CARB's Mobile Source Strategy appears to assume the same 11,000 buses operating for the entire state. Please verify the fleet assumption for the draft AQMP. The documentation for this inventory, along with the assumed fleet mix, should also be provided and shown in the Final PEIR. Further, please clarify that SCAQMD or CARB intend on conducting a subsequent and more detailed CEQA analysis as part of this rulemaking process in the future.

Finally, please note that implementation of ORHD-04 may result in significant expenses to transit providers that could necessitate fare increase and/or reduced service. This could negatively impact low-income and environmental justice communities. These potential impacts should be addressed in the PEIR.

EGM-01 – Emission Reductions from New Development and Redevelopment Projects

This measure appears to be under the jurisdiction of the SCAQMD and has a tentative adoption date of 2017. Implementation would occur between the years 2018-2031. AQMD states that this measure "seeks to capture emission reduction opportunities during the project development phase and opportunities to enable greater deployment of zero and near-zero emission

technologies.”¹ This language is vague, and the measure does not identify emission reductions, cost-effectiveness, affected entities, or legal authority. However, although lacking detail or specificity, the Draft PEIR has identified the following potential environmental impacts: Air quality, energy, hazards, water quality and solid waste.

OCTA requests more information on this measure, so that a thoughtful analysis can occur and comments can be submitted. Specifically, please describe what assumptions were used to make the impact determinations. If a working group is convened for this measure, OCTA respectfully requests inclusion to assist with the rule development process.

Emission reductions with this measure, and many others, are identified as “To Be Determined” (TBD), which makes it difficult to assess benefits and potential adverse environmental impacts. Given the lack of specificity with these TBD measures, please explain whether it is necessary to include them in the PEIR, or if it would be more appropriate to analyze them separately once they are more refined.

Air Quality Impacts

Potential air quality and greenhouse gas emissions were projected from the use of additional electricity and alternative fuels. As stated previously, the emissions analysis should be clearly quantified so that this information can be more easily reviewed and verified. OCTA is particularly interested in the details regarding the emissions calculated for ORHD-04 to better understand potential adverse impacts related to increased demand for electricity and alternative fuels.²

A significant decrease in fuel usage was accounted for based on the implementation of ORHD-04. Specifically, this decrease was estimated at 88,902,832 gallons per year by 2023 and 77,251,722 by 2031. Please explain or provide the assumptions and calculations that went into these figures. Further, the estimated increase in clean transit vehicles is listed at 11,000 by 2023 and 11,000 by 2031. If the inventory for the four-county Basin is actually estimated to be 11,000 transit buses, it is unclear why the turnover appears to be estimated at exactly double this figure. Please provide the assumptions and calculations that went into Table 4.1-5.³

¹ Draft Program EIR for the 2016 AQMP, page 2-27, October 2016.

² Draft Program EIR, Table 4.1-4, page 4.1-48, October 2016.

³ Draft Program EIR, Table 4.1-5, page 4.1-52, October 2016.

Energy Impacts

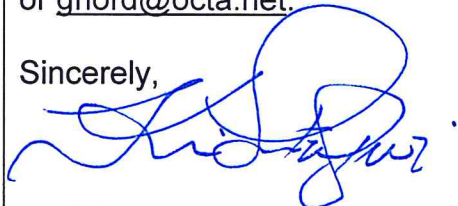
Table 4.2-5 in the Draft PEIR evaluates potential energy impacts from the 2016 AQMP. ORHD-04 is shown as having a fleet of 11,000 buses within the South Coast region, each averaging 16,600 miles per year. It further assumes that this sector will need an additional 183 gigawatts (GW)/hour in 2023 and 183 GW/hour in 2031. Please, again, verify the fleet assumption and provide details for the energy consumption calculation. Also, please explain why this energy usage number is identical in 2023 and 2032. It seems unlikely that the fleet turnover and energy usage would be exactly the same for both years.⁴

ORHD-04 is included in an additional line item in Table 4.2-5. It indicates that ORHD-03, ORHD-04, ORHD-05, ORHD-06 and ORHD-08 will have a combined electricity usage of 1,909 GW/hour in 2023 and 4,067 GW/hour in 2031. Please clarify why ORHD-04 is being counted twice and what the difference is between the two line items for ORHD-04.

The natural gas sector under the Energy Impacts analysis has also identified ORHD-04 as creating an increase in demand. When explaining the fleet mix and assumptions, it would be helpful to know if a certain percentage of buses were assumed to turnover to electric engines versus natural gas.

Thank you once again for the opportunity to provide input on the Draft 2016 AQMP PEIR. Should you have any questions regarding the comments above, please contact Greg Nord, Principal Transportation Analyst, at 714-569-5885, or gnord@octa.net.

Sincerely,



Kia Mortazavi
Executive Director, Planning

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⁴ Draft Program EIR, Table 4.2-5, page 4.2-13, October 2016.