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April 7, 2017

Ms. Mary Nichols  
Chair  
California Air Resources Board  
101 I Street  
Sacramento, CA 95814

RE: **Comments on the 2017 Climate Change Scoping Plan Update**

Dear Ms. Nichols:

Thank you for the opportunity to comment on the draft 2017 Climate Change Scoping Plan Update (Scoping Plan) for achieving California's 2030 greenhouse gas (GHG) target. The Scoping Plan goals and the Orange County Transportation Authority (OCTA) mission are complementary in many ways, but OCTA has concerns regarding the approach and expectations that have been developed by the California Air Resources Board (CARB). Specifically, the Scoping Plan includes ambitious goals, such as:

- Quadruple walking trips by 2030 (from a baseline of the 2010–2012 California Household Travel Survey),
- Increase bicycle trips nine-fold by 2030 (from a baseline of the 2010–2012 California Household Travel Survey), and
- Reduce the total light duty vehicle miles traveled by 15 percent by 2050 (no baseline identified).

While OCTA is making investments in pedestrian and bikeway facilities throughout Orange County to expand transportation choices, changes of the magnitude listed above would require significant amendments to local general plans and repurposing of existing land uses. These strategies are not always practical for every community. Further, they carry a level of uncertainty due to local land use policies, fluctuations in market demands, individual and family preferences (for travel, housing, employment, schools, etc.), and many other factors.

The Scoping Plan should, instead, clearly prioritize growth of zero- and near-zero emission vehicles as the primary strategy for achieving GHG emission reductions from the mobility sector. This approach is also supported within the South Coast Air Quality Management District's recently adopted 2016 Air Quality Management Plan, through the "Further Deployment of Cleaner Technologies" measures. By prioritizing this within the Scoping Plan, the state's limited resources would focus on strategies

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that can more quickly reduce GHG emissions by targeting vehicles – an asset that over 92 percent of households in California have (United States Census Bureau, 2011-2015 American Community Survey Five-Year Estimates). This approach also provides the co-benefit of reducing criteria pollutant emissions, which helps non-conforming air basins to achieve attainment with federal air quality requirements.

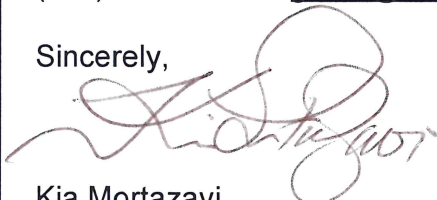
Zero- and near-zero emission vehicles are also available for many applications beyond personal travel, but require incentive program investments from the state to off-set the incremental costs of conventional technologies. This is particularly true for transit vehicles, where higher capital costs could impact funding for service. An example of this approach includes CARB's recent award of \$10 million in state air quality funds to OCTA for hydrogen fuel cell buses. Each bus costs approximately \$1.2 million, and state incentives make this investment possible.

OCTA is taking other actions that reduce GHG emissions and to improve air quality and environmental sustainability. These include upgrades to our bus fleet, such as: utilizing renewable natural gas, repowering 199 buses with 0.2 grams per brake horse-power engines, and ordering 0.02 gram per brake horse-power engines for 98 buses in our fleet. With additional financial support from the state, transit agencies can further advance the market for zero- and near-zero emission technologies that could be transferred to other industries.

In conclusion, the most efficient strategies for achieving the state's emission reduction goals are further incentives for zero- and near-zero emission vehicles. Moreover, investing in technology is better suited for achieving the Scoping Plan's goal of providing models that can be reproduced by other governing entities. Long-term shifts to the built environment and behavior of individuals will face a greater number of challenges to implement, both within California and elsewhere.

Thank you for your consideration of the above comments. Should you have any questions, please contact Greg Nord, Principal Transportation Analyst, at (714) 560-5885 or [gnord@octa.net](mailto:gnord@octa.net).

Sincerely,

A handwritten signature in dark ink, appearing to read "Kia Mortazavi", with a stylized flourish at the end.

Kia Mortazavi  
Executive Director, Planning

KM:gn

c: CARB Clerk of the Board  
Greg Nord, OCTA