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Darrell Johnson
Chief Executive Officer

July 19, 2017

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Proposed Update to the SB 375 (Chapter 728, Statutes of 2008)
Greenhouse Gas Emission Reduction Targets and Environmental
Analysis**

Dear Clerk of the Board:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and provide comments on the updated greenhouse gas (GHG) emission reduction targets (targets) and the environmental analysis, proposed by the California Air Resources Board (CARB). OCTA agrees with CARB's approach to focus the review on the 2035 targets, as 2020 is fast approaching, and metropolitan planning organizations (MPOs) throughout the state are facing significant challenges to meet the current 2020 targets.

Considering these challenges, and the current lack of data regarding the effectiveness of implemented projects and programs that support goals of Sustainable Communities Strategies (SCS), OCTA respectfully requests that CARB take a more conservative approach in this review cycle. As CARB is aware, the targets are eligible to be reviewed again in just four years, and the review process would benefit greatly from data collected through anticipated SCS implementation monitoring efforts. Therefore, OCTA encourages CARB to collect and analyze this data before making drastic changes to the targets.

The CARB draft staff report titled "Proposed Update to the SB 375 (Chapter 728, Statutes of 2008) GHG Emission Reduction Targets" notes under "Next Steps" that CARB intends to track SCS implementation efforts and outcomes to understand whether the SCS strategies are working. Moreover, the current version of SB 150 (Allen, D-Santa Monica), if passed, would require that CARB prepare a report by September 1, 2018, assessing the progress made by MPOs in meeting their targets.

This documentation and analysis, whether required by law or conducted as a CARB initiative, would greatly serve the target review process, and help to ensure that the targets remain ambitious and achievable within financially constrained Regional Transportation Plans and SCSs. Through discussions with the Southern California Association of Governments (SCAG) and other SCAG region stakeholders, there is a common concern that CARB's proposed targets are not achievable.

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At the June 21, 2017, workshop conducted by CARB, several discrepancies between SCAG and CARB target evaluations were discussed that are causing much of this concern. These discrepancies need to be discussed with SCAG and resolved before any further action is taken by CARB to advance the current proposed targets.

SCAG's assumptions were derived through a collaborative effort between SCAG, the San Diego Association of Governments, the Bay Area's Metropolitan Transportation Commission, and the Sacramento Area Council of Governments. This collaboration served to provide CARB with insights through a bottom-up approach for identifying ambitious and achievable targets. OCTA is requesting that CARB reconsider using the targets recommended by these MPOs.

The MPOs have the greatest understanding of opportunities, issues, and modeling capabilities for developing and analyzing an SCS. Further, these agencies have consistently included all feasible GHG emission reduction strategies and best practices to address the current targets, so there is no reason to believe they would do anything less in future SCSs. Therefore, establishing exceedingly high targets does nothing but put these regions at risk of not achieving their targets.

OCTA is requesting that CARB relies on the insights and recommendations that have been provided by the MPOs for the 2018 target setting process. Until sufficient data is gathered and reviewed through the aforementioned monitoring reports, the statutorily required consultative process with the MPOs is the best available measure of what should be considered ambitious and achievable. Should you have any questions regarding this letter, please contact Greg Nord, Principal Transportation Analyst, at (714) 560-5885 or gnord@octa.net.

Sincerely,



Darrell Johnson
Chief Executive Officer

DJ:gn

c: OCTA Board of Directors;
OCTA Executive Staff;
Hassan Ikhata, Executive Director, SCAG;
Marnie Primmer, Executive Director, OCCOG