



AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

Service Authority for
Abandoned Vehicles

August 31, 2012

Dr. Barry R. Wallerstein
Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dear Dr. Wallerstein:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and comment on the Draft 2012 Air Quality Management Plan (AQMP) for the South Coast Air Quality Management District (District). The related socio-economic report has not yet been made publically available; therefore, OCTA would appreciate an extension of the comment period in order take this additional analysis into consideration. Please note that the comments provided below may require additions or modifications once OCTA reviews the results of the socio-economic report.

There are three issues that currently raise concerns with OCTA:

1. Inclusion of the ozone attainment strategy;
2. The suggested "Enhanced Environmental Analysis" that is discussed in Chapter 9; and,
3. The "Infrastructure Planning Actions" that are discussed in Appendix IV-B under control measure ADV-01.

According to federal law, the current AQMP is required to demonstrate attainment for inhalable coarse particles (PM₁₀) and fine particles (PM_{2.5}); however, it is not required that ozone attainment be addressed until the 2015 AQMP. The ozone target needs to be looked at in a comprehensive manner, rather than piecemeal, to ensure that we are actually reducing emissions in the most cost efficient and effective manner. This would be best achieved by reserving discussion of the ozone attainment to the 2015 AQMP. OCTA looks forward to participating in these discussions, and working with the District to develop an achievable 2015 AQMP that meets all of the federal Clean Air Act standards.

The Enhanced Environmental Analysis recommends performing additional analysis that goes beyond the requirements of the California Environmental Quality Act (CEQA). As noted in the Draft AQMP, the *Ballona Wetlands Land*

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Trust v. City of Los Angeles (2011) and the *South Orange County Wastewater Authority v. City of Dana Point* (2011) ruled that this type of analysis is not required under CEQA. Therefore, OCTA suggests omitting this policy recommendation from the 2012 AQMP.

Regarding the Infrastructure Planning Actions identified in ADV-01, the District is suggesting that in order to support zero and near-zero emission technologies for freight trucking, new infrastructure such as wayside electric or magnetic power built into roadways, refueling and battery recharging stations, and dedicated truck lanes may be required. Furthermore, the District states under the ADV-01 actions and schedules, it is important that project approvals for near-term goods movement projects ensure implementation of these types of infrastructure. However, the District also states that at this time it is unknown if the zero and near-zero emission technologies will require these types of infrastructure.

OCTA believes that there are too many unknowns regarding the zero and near-zero technologies to justify including infrastructure commitments in project approvals at this time. The types of infrastructure suggested could have significant financial implications. Furthermore, they may not be feasible for any number of reasons, such as costs, right-of-way limitations, resulting environmental impacts, or limited availability of the specific technology(ies). For these reasons, OCTA requests removal of the language suggesting that project approvals ensure implementation of infrastructure to support zero and near-zero emission technology.

Thank you again for the opportunity to comment on the Draft AQMP. OCTA requests that the District address these concerns and recommendations in the Final Draft 2012 AQMP. Please contact Greg Nord, Senior Transportation Analyst, at (714) 560-5885 to further discuss these comments.

Sincerely,



Kurt Brotcke
Director, Strategic Planning

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