

South Coast
AQMD

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

April 17, 2015

Mr. Gabriel Corley
CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Dear Mr. Corley:

**SCAQMD Staff Comments Regarding
the Draft California Transportation Plan 2040**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide comments on the draft California Transportation Plan (CTP) 2040. The SCAQMD staff appreciates the efforts that went into the Draft CTP 2040. The Draft CTP 2040 does mention some of the components necessary to meeting air quality goals. However, there should be greater clarity on the distinction between California's Greenhouse Gas (GHG) reduction goals per AB 32 and SB 375, and air quality requirements imposed on the different regions of California based on the need to meet National Ambient Air Quality Standards (NAAQS). For the South Coast Air Basin, there are federal deadlines to meet the ozone and fine particulate matter NAAQS in the 2020 to 2030 timeframe. As such, we urge you to include a separate discussion on air quality needs separate from the discussions on GHGs. As part of the discussion on air quality, there is a need to discuss specific actions that can be implemented in a timely manner to help meet national ambient air quality standards by their applicable dates. More specific comments are provided below.

The Draft report, on pages 89 and 151, references the California Air Resources Board's Vision for Clean Air document, and states that it "evaluates strategies to meet California's multiple air quality and climate change goals well into the future (to the year 2050)." However, it should be clarified that while the State has adopted GHG goals for 2050, the NAAQS are federally imposed and are approaching in short order.

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Regionally, attaining federal ozone standards in the South Coast Air Basin will require substantial additional emission reductions region wide: approximately two-thirds reduction in NOx emissions beyond the benefits of existing rules and programs by 2023, and three-fourths by 2032. Attaining the federal standards will require broad deployment of zero and near zero emission technologies. Goods movement, which is by far the largest source of NOx emissions, must be a part of the zero-emission solution.

In addition to protection of public health, there are legal and economic imperatives to reduce emissions. Under the federal Clean Air Act, states must adopt and implement plans sufficient to attain national air quality standards or else the state could face sanctions including the loss of federal transportation funds and limits on construction of new factories, power plants and other facilities.

The document makes several references to "environmental stewardship" but fails to mention anything about the need to meet the federal air quality standards by their impending deadlines.

The SCAQMD and other agencies have generally implemented policies that seek to simultaneously address environmental needs *and* accommodate economic growth. Three strategies are needed to accomplish this in the context of passenger transportation and freight movement: (1) replacing existing technologies with advanced clean technologies, (2) achieving greater operational efficiencies, and (3) allowing sufficient distance between sources of mobile source air toxic emissions such as diesel exhaust, and schools, residences, etc. The Draft CTP 2040 can and should play a role in the effort to implement these strategies.

1. *Technology*. Providing funding and policy support for development, demonstration and deployment of needed clean technologies, including support for transportation and other infrastructure that *enables* and *incentivizes* use of zero- and near-zero emission technologies.

The majority of emission reductions achieved to date have occurred through transitioning to lower emission technologies, and we expect this to be the case in the future. Accelerating fleet turnover to the latest, lowest emission, vehicles on the road today is important, but will not, by itself, be sufficient to attain the federal standards. This is because on-road truck fleets will largely have turned over to the latest model year 2010 standards by the 2023 and 2032 ozone attainment deadlines. In addition, greater penetration of zero-emission and plug-in hybrid vehicles will be needed to reduce emissions from passenger cars.

The magnitude of additional NOx emission reductions needed to attain federal ozone standards in the South Coast Air Basin will require development and broad deployment of zero and near-zero emission technologies where possible. Many of

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these technologies are commercially available for passenger cars and small trucks. In addition, there are now zero- and near-zero emission heavy-duty trucks under development and demonstration that will provide significant reductions in criteria pollutant and GHG emissions. To provide climate benefits needed to attain state targets, a substantial portion of fuels and electricity for such technologies will need to be derived from renewable sources.

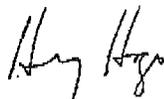
For these reasons, the Draft CTP 2040 needs to include goals such as developing, demonstrating and deploying new advanced clean technologies for passenger-related sources such as passenger locomotives, ferries, and cruise ships as well as freight related sources such as heavy-duty trucks and other freight-related sources such as locomotives and ocean-going vessels. These are key elements of the State Implementation Plan (SIP) to attain federal ozone standards.

2. *Efficiency.* It is necessary to adopt strategies to improve efficiency and reduce congestion, VMT, fuel use and emissions. Improvements in passenger and freight traffic flow and management have potential to improve productivity, cut congestion, reduce fuel use and vehicle miles traveled—and provide concomitant economic, air quality, and greenhouse gas reduction benefits.
3. *Distance.* Implementing policies to provide sufficient distance between diesel-powered freight transport projects and schools, residences and other receptors to avoid significant health risks, e.g. through guidelines for freight facility siting and truck routes.

We urge you to incorporate these changes into the final version of Draft CTP 2040, so that statewide transportation planning and statewide air quality planning are in sync, and Southern California's efforts to achieve cleaner air are complemented by Caltrans' efforts to modernize our State's transportation system.

We look forward to working with Caltrans in finalizing the CTP 2040. Feel free to call me at (909) 396-3184 if you have questions regarding our comments.

Sincerely,



Henry Hogo
Assistant Deputy Executive Officer
Mobile Source Division
Science and Technology Advancement