



AFFILIATED AGENCIES

Orange County  
Transit District

Local Transportation  
Authority

Service Authority for  
Freeway Emergencies

Consolidated Transportation  
Service Agency

Congestion Management  
Agency

July 14, 2022

California Environmental Protection Agency  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: **Draft 2022 Progress Report - California's Sustainable Communities and Climate Protection Act**

To Whom It May Concern:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Draft 2022 Progress Report on California's Sustainable Communities and Climate Protection Act. The following comments are provided for your consideration:

- Pages 45 and 46, Section "Authorize Transportation Pricing," Subsection "Potential Actions," second and third bullets:
  - Please ensure that eligibility to implement various pricing strategies is not a one-size-fits all approach and reflects the nuances of governance and institutional arrangements already in place for existing pricing programs, such as express lanes. Any statewide guidance needs to allow for flexibility to meet regional and local needs. Any pricing programs must be refined at the regional and local levels.
- Page 47, Section "Optimize the Transit Experience," Subsection "Potential Actions," fourth bullet:
  - Rather than adding new requirements to the Transportation Development Act, the Legislature should explore new revenue sources to support transit agencies, especially for operations.
- 
- Page 47, Section "Optimize the Transit Experience," Subsection "Potential Actions," fifth bullet:
  - Empirical evidence on transit ridership trends in Southern California suggest that transit fare prices have not played a dominate role for declining ridership among heavy transit users. While policies to ensure transit is affordable and cost-competitive to driving are important, it may not be the most important policy to grow ridership especially as transit agencies struggle to find adequate resources to meeting increasing operating costs.

- Page 48, Section “Accelerate Delivery of VMT-Reducing Projects,” Subsection “Potential Actions,” fourth bullet:
  - The State’s Vehicle Miles Traveled (VMT) reductions goals are not the only objective that regional and local agencies must consider in developing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and cannot be overly simplified.
  
- Page 48, Section “Accelerate Delivery of VMT-Reducing Projects,” Subsection “Potential Actions,” fifth bullet:
  - It is unclear how feasible, or legal, adding emissions reductions and equity thresholds to existing local transportation tax measures would be. Given that emissions and VMT analyses are already required as part of project-level California Environmental Quality Act evaluation, it is unclear what benefit the additional requirements would achieve.

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714)-560-5907 or at [dphu@octa.net](mailto:dphu@octa.net).

Sincerely,



Dan Phu  
Manager, Environmental Programs