



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
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Edmund G. Brown Jr.
Governor

March 14, 2013

Mr. Hasan Ikhata
Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017

Dear Mr. Ikhata:

I am writing today to inform you that Air Resources Board (ARB) staff has reviewed the projects submitted by the Southern California Association of Governments (SCAG) on behalf of the Orange County Transportation Authority (OCTA) as substitute transportation control measures (TCMs). The projects are the implementation of 10 traffic signal synchronization projects as substitute TCMs for the purchase of 71 buses and transit service expansion in Orange County. ARB staff concurs that these substitute projects meet the procedural and emission reduction requirements for substitution of a TCM in an approved State Implementation Plan (SIP).

The Clean Air Act (Act) transportation conformity provisions specify the procedures to substitute or add a TCM to an approved SIP. The Act requires that the replacement TCM must achieve equal or greater emission reductions, be implemented on a schedule consistent with the measure being replaced, and be supported by adequate resources and authority to be implemented, monitored, and enforced. The TCM must be developed through a collaborative process involving all affected jurisdictions, ARB, U.S. Environmental Protection Agency (U.S. EPA), and the public.

We have reviewed the analysis provided by SCAG and OCTA for the 10 traffic synchronization projects and concur with the TCM substitution for Orange County. Enclosed with this letter is a table summarizing ARB staff findings.

The transportation conformity provisions of the Act provide that our concurrence with SCAG's finding, together with the concurrence of the U.S. EPA Administrator, constitute adoption of the TCM. The Act further provides that once adopted, the substitute measure or measures become part of the SIP by operation of law.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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ARB will submit the substitute TCM to U.S. EPA for incorporation in the codified applicable SIP within 90 days in accordance with the Act. U.S. EPA will then update the Code of Federal Regulations to reflect the changes to the SIP to clarify that the replacement TCM is part of the federally enforceable SIP.

If you have any questions or would like to discuss this decision, please contact Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739. Technical questions may be directed to Mr. Jason Crow, Air Pollution Specialist, at (916) 322-0339.

Sincerely,



James N. Goldstene
Executive Officer

Enclosure

cc: See next page.

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cc: Mr. Jared Blumenfeld
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Lynn Terry
Deputy Executive Office

Mr. Jason Crow
Air Pollution Specialist
Planning and Technical Support Division

Attachment

**Air Resources Board Staff Review of Substitute Transportation Control Measures proposed by the
Southern California Association of Governments (SCAG)
(On behalf of the Orange County Transportation Authority (OCTA))**

**TCM substitution being reviewed: Implementation of ten traffic signal synchronization projects as substitute
TCMs for purchase of 71 buses and transit service expansion in Orange County.**

Date reviewed by ARB: February 26, 2013
Reviewer: Jason Crow

Transportation Review Criteria from Federal Clean Air Act Section 176(c)(8):	Is Criterion Satisfied? Y/N	Summary
The substitute measures achieve equivalent or greater emissions reductions than the control measure to be replaced.	Y	Ten traffic synchronization projects are proposed as substitute TCMs for the purchase of 71 buses and transit service expansion which are TCMs in the current TIP. OCTA conducted an emissions analysis using EMFAC 2007 emission factors, and concluded that the replacement projects would provide equal or greater emissions reductions.
The substitute control measures are implemented in accordance with a schedule that is consistent with the schedule provided for control measures to be replaced in the implementation plan, and implemented in an area consistent with the original control measures.	Y	The ten traffic synchronization projects are proposed for completion by June, 2014 within the Orange County portion of the South Coast Air Basin, which is ahead of the June 2016 schedule for the bus purchase and service expansion. Note that the SIP does not rely upon explicit emission reductions from either project.
The substitute and additional control measures are accompanied with evidence of adequate personnel, funding and authority under State or local law to implement, monitor, and enforce the control measures.	Y	The proposed traffic signal projects will be completed by OCTA, who has secured the necessary funding and has the legal authority under state law to implement, operate and monitor the replacement traffic signal projects.
The substitute and additional control measures were developed through a collaborative process that included participation by representatives of all affected jurisdictions (including local air pollution control agencies, the State air pollution control agency, and State and local transportation agencies).	Y	The draft final report was discussed by the SCAG Transportation Conformity Working Group (TCWG) in publically noticed meetings on September 25, 2012 and October 23, 2012. Members of the TCWG include: SCAG, U.S. EPA, Federal Highway Administration, Federal Transit Administration, Air Resources Board, Caltrans, and the South Coast Air Quality Management District.
The substitute and additional control measures were developed through a collaborative process that included reasonable public notice and opportunity for comment.	Y	The replacement TCM and report were noticed to the public on November 28, 2012. The notice initiated a 15-day public review and comment period. The draft documentation was available for review at the Southern California Association of Governments office, located at 818 West Seventh Street, Los Angeles, California 90017 or www.scag.ca.gov . No comments were received.

<p>The metropolitan planning organization, State air pollution control agency, and the U.S. EPA Administrator concur with the equivalency of the substitute or additional control measures.</p>	<p>Y</p>	<p>The replacement TCM was approved, in the form a vote of the SCAG Regional Council on February 7, 2013. The U.S. EPA is also expected to concur with the substitution. U.S. EPA's letter is expected in early 2013. This letter documents ARB's review and concurrence with the substitution.</p>
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