



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

October 26, 2010

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 (TCM). The projects are the implementation of three traffic signal synchronization projects as substitute TCMs for three bus rapid transit line projects on Bristol Street/State College Boulevard, Harbor Boulevard, and Westminster Avenue/17th Street 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).

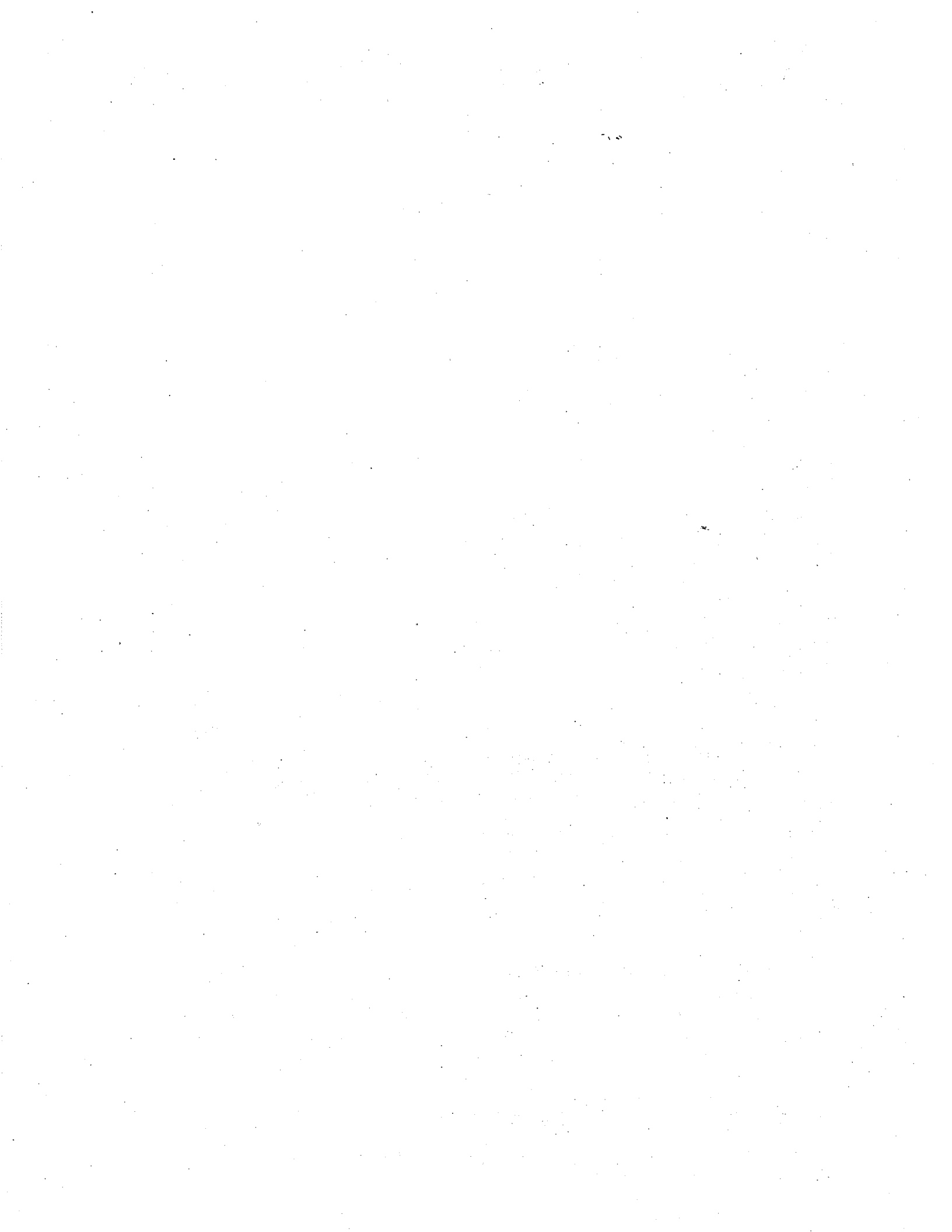
The Clean Air Act (the Act) transportation conformity provisions specify the procedures to substitute or add a TCM to an approved SIP. The Act requires that the replacement TCM must achieve equal or greater emission reductions, be implemented on a schedule consistent with the measure being replaced, 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 three 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

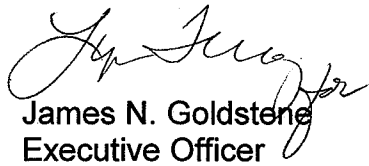


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ARB will submit the substitute TCM to U.S. EPA for incorporation in the codified applicable SIP within 90 days in accordance with the Act. U.S. EPA will then update the Code of Federal Regulations to reflect the changes to the SIP to clarify that the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

If you have any questions or would like to discuss this decision, please contact me at (916) 445-4383. Technical questions may be directed to Mr. Dennis Wade at (916) 327-2963.

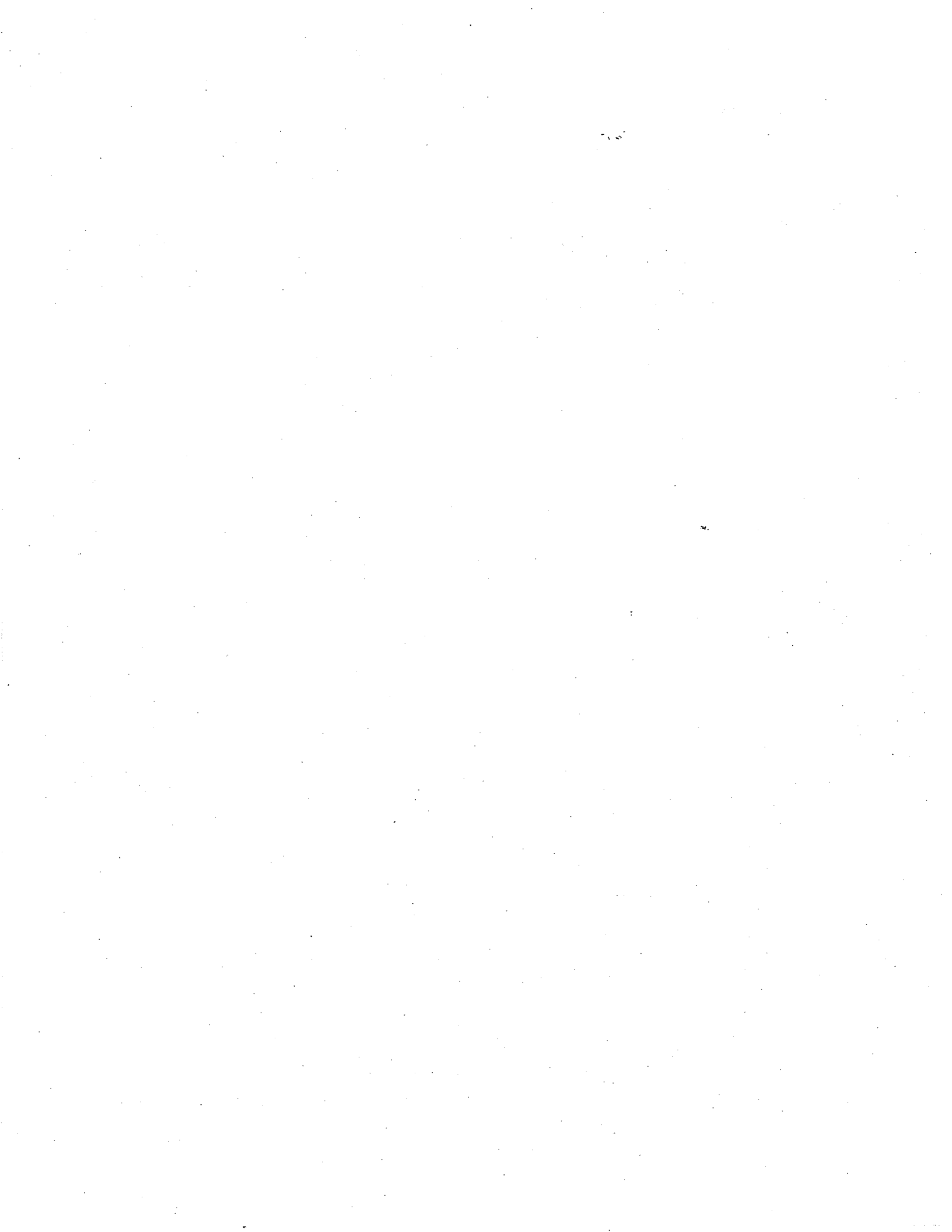
Sincerely,



James N. Goldstone
Executive Officer

Enclosure

cc: See next page.



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cc: Mr. Jared Blumenfeld
Regional Administrator
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

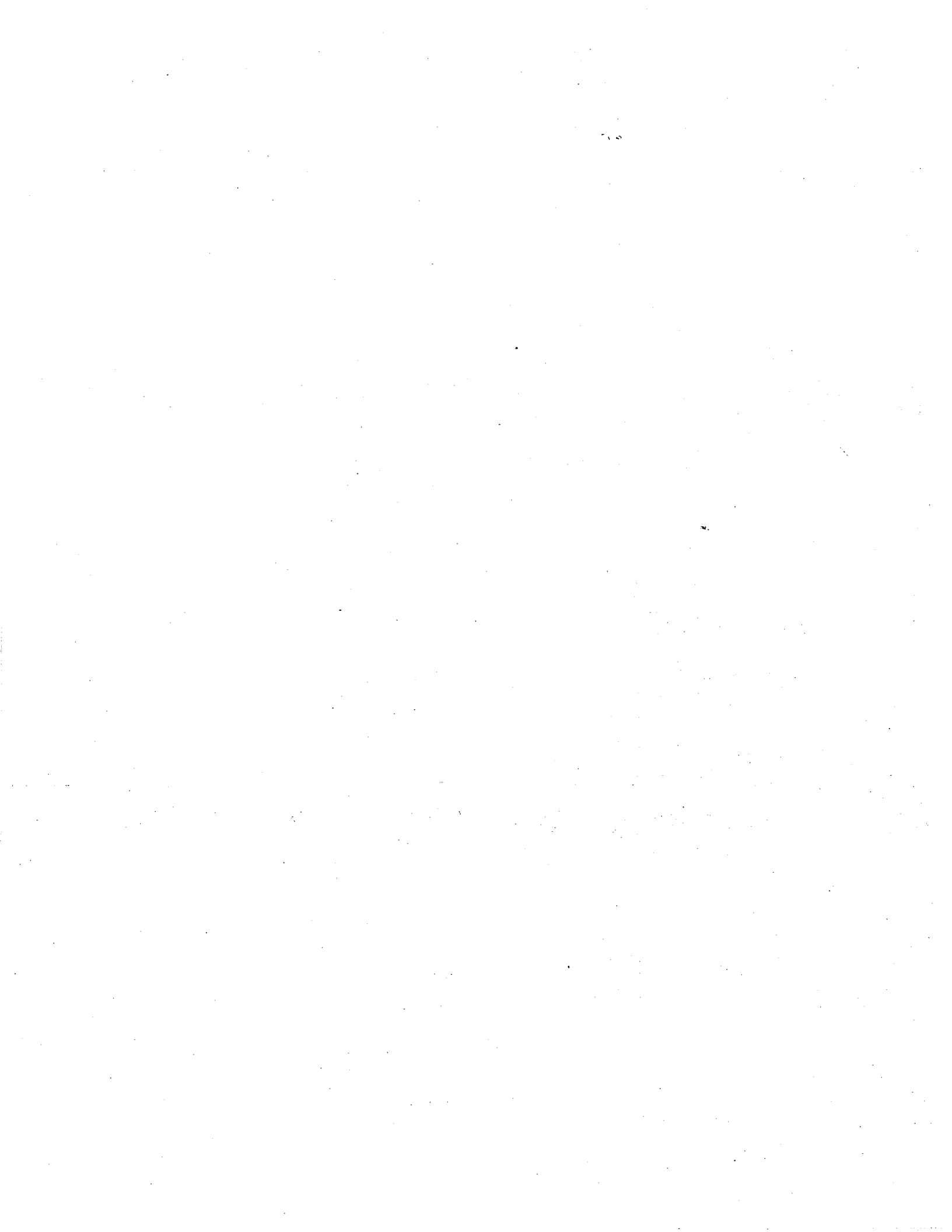
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Mr. Dennis Wade
Air Pollution Specialist
Planning and Technical Support Division



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 three traffic signal synchronization projects as substitute TCMs for three bus rapid transit (BRT) line projects on Bristol Street/State College Boulevard, Harbor Boulevard, and Westminster Avenue/17th Street in Orange County.

Date reviewed by ARB: September 20, 2010
Reviewer: Dennis Wade

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	Three traffic synchronization projects are proposed as substitute TCMs for the same three corridors that were scheduled for BRT lines which are TCMs in the current TIP. OCTA conducted an emissions analysis using EMFAC 2007 emission factors, and concluded that there would be no change in emissions of ROG and NOx between the original BRT lines and the substitute traffic signal synchronization projects
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 three traffic synchronization projects are proposed for completion by June, 2011 in Orange County along the same three corridors the original BRT projects were scheduled for, and with the same completion date. 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 meeting on January 26, 2010. 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 April 13, 2010. The notice initiated a 30-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

<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 July 1, 2010. The U.S. EPA is also expected to concur with the substitution. U.S. EPA's letter is expected in late September, 2010. This letter documents ARB's review and concurrence with the substitution.</p>
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