February 2, 2016

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

Dear Mr. Ikhrata:

Air Resources Board (ARB) staff has reviewed the project submitted by the Southern California Association of Governments (SCAG) on behalf of the Riverside County Transportation Commission (RCTC) as a substitute transportation control measure (TCM). The project is the implementation of an express bus expansion project to support increased commuter transit as part of the State Route 91 improvement program as a substitute for the construction of two bus transit facilities in the City of Hemet and the City of Temecula.

The Clean Air Act (Act) transportation conformity provisions specify the procedures to substitute or add a TCM to an approved State Implementation Plan (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, the U.S. Environmental Protection Agency (U.S. EPA), and the public.

We have reviewed the analysis provided by SCAG and RCTC for the proposed substitute TCM project and concur that it meets the procedural and emission reduction requirements for substitution of a TCM in an approved SIP. 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 TCMs. The Act further provides that once adopted, the substitute measure or measures become part of the SIP by operation of law. ARB will submit the

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California Environmental Protection Agency

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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 TCMs are part of the federally enforceable SIP.

If you have any questions or would like to discuss this decision, please contact Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739. Technical questions may be directed to Mr. Dennis Wade, Air Pollution Specialist, at (916) 327-2963.

Sincerely,

[Signature]

Richard W. Corey
Executive Officer

Enclosure

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

Mr. Jermaine Hannon, Director  
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California Division  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
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Mr. Phillip Fine, Ph.D.  
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South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765-4178  

Ms. Katie Benouar, Chief  
Division of Transportation Planning  
California Department of Transportation  
1120 N Street  
P.O. Box 942874, MS-49  
Sacramento, California 94274  

Mr. Kurt Karperos  
Deputy Executive Officer  
Executive Office  

Mr. Dennis Wade  
Air Pollution Specialist  
Air Quality Planning and Science 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 Riverside County Transportation Commission (RCTC))

TCM substitution being reviewed: Implementation of an express bus expansion project to support increased commuter transit as part of the State Route 91 improvement program as a substitute for the construction of two bus transit facilities in the City of Hemet and the City of Temecula.

<table>
<thead>
<tr>
<th>Transportation Review Criteria from Federal Clean Air Act Section 176(c)(8):</th>
<th>Is Criterion Satisfied? Y/N</th>
<th>Summary</th>
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</thead>
<tbody>
<tr>
<td>The substitute measures achieve equivalent or greater emissions reductions than the control measure to be replaced.</td>
<td>Y</td>
<td>Substitute measure is the implementation of an express bus expansion project to support increased commuter transit as part of the State Route 91 improvement program as a substitute for the construction of two bus transit facilities in the City of Hemet and the City of Temecula which have been delayed due to siting issues. The replacement TCM includes express bus expansion service for two new routes, 200 and 205, in Riverside County serviced by 7 new buses. The replacement projects provide equivalent emission reductions for PM, ROG and NOx as supported with emission model runs and documented by the Riverside County Transportation Commission (RCTC). The CO emissions for the substitute measure will increase. US EPA staff indicates that the increase in CO expected in year 2016 is very small (&lt;2%) in terms of the overall CO inventory for the South Coast Air Basin. CO levels in Riverside County have been below the 8 hour standard for 20 years, are approximately 20% of the standard, and continue to drop. US EPA staff has indicated that the project still provides equivalent reductions given the small increase in CO. Emissions were calculated using EMFAC 2011 emission rates and using methods contained in the document “Methods to Calculate the Cost Effectiveness of Air Quality Projects” published by ARB.</td>
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<tr>
<td>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.</td>
<td>Y</td>
<td>The original Transit Centers were to be completed in December of 2015. The replacement TCM projects will be implemented and operational in December of 2016, one year later. The original TCM is not relied upon for reasonable further progress or attainment in the approved SIP. Both the original and the replacement TCM projects are located in western Riverside portion of the South Coast Air Basin.</td>
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<td>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.</td>
<td>Y</td>
<td>The Riverside Transit Agency (RTA) has the legal authority to implement and operate the express buses and has implemented similar projects before. RTA will use local funds for capital and operating expenses.</td>
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<td>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).</td>
<td>Y</td>
<td>The draft final report was discussed by the SCAG Transportation Conformity Working Group (TCWG) in publically noticed meetings on April 28 and May 26, 2015. 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 as well as RCTC.</td>
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<tr>
<td>The substitute and additional control measures were developed through a collaborative process that included reasonable public notice and opportunity for comment.</td>
<td>Y</td>
<td>The replacement TCM and report were noticed to the public on May 13, 2015. The notice initiated a 15-day public review and comment period. The draft documentation was available for review at the SCAG office, located at 818 West Seventh Street, Los Angeles, California 90017 or <a href="http://www.scag.ca.gov">www.scag.ca.gov</a>. No comments were received.</td>
</tr>
<tr>
<td>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.</td>
<td>Y</td>
<td>The replacement TCM was approved, in the form a vote of the SCAG Regional Council on June 4, 2015. The U.S. EPA is also expected to concur with the substitution. U.S. EPA’s letter is expected in January 2016. This letter documents ARB’s review and concurrence with the substitution.</td>
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