August 26, 2015

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 regional vanpool submitted by the Southern California Association of Governments (SCAG) on behalf of the San Bernardino Associated Government (SANBAG) as a substitute transportation control measure (TCM). The project is a substitute TCM for the expansion of two Metrolink park and ride lots in the cities of Upland and Rialto. ARB staff concurs that this substitute project meets 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 SANBAG for the regional vanpool program and concur with the TCM substitution for San Bernardino 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 Regional 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. 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

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California Environmental Protection Agency

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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 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,

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  
Planning and Air Quality  
California Division  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, California 95814-4708

Mr. Phillip Fine, Ph.D.  
Deputy Executive Officer  
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 San Bernardino Associated Government (SANBAG))

TCM substitution being reviewed: Implementation of a regional vanpool program as a substitute TCM for expansion of two Metrolink park and ride lots in the cities of Rialto and Upland in San Bernardino County.

<table>
<thead>
<tr>
<th>Date reviewed by ARB: August 4, 2015</th>
<th>Reviewer: Dennis Wade</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation Review Criteria from Federal Clean Air Act Section 176(c)(8):</td>
<td>Is Criterion Satisfied? Y/N</td>
</tr>
<tr>
<td>The substitute measures achieve equivalent or greater emissions reductions than the control measure to be replaced.</td>
<td>Y</td>
</tr>
<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>
</tr>
<tr>
<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>
</tr>
<tr>
<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>
</tr>
<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>
</tr>
<tr>
<td>Measure</td>
<td>Y</td>
</tr>
<tr>
<td>---------</td>
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<tr>
<td>The Metropolitan Planning Organization, State Air Pollution Control Agency, and the U.S. EPA Administrator received the comment that the replacement TCM was approved in the form of the SCAG's letter of concurrence.</td>
<td>Y</td>
</tr>
<tr>
<td>The Regional Council on April 2, 2015, the U.S. EPA issued a letter of concurrence with the substitution of the substitution of additional control measures with the equivalence of the substitution of additional control measures.</td>
<td>Y</td>
</tr>
<tr>
<td>This letter documentARB's Review and Concurrence with the Substitution</td>
<td>Y</td>
</tr>
<tr>
<td>The replacement TCM was approved in the form of the SCAG's letter of concurrence.</td>
<td>Y</td>
</tr>
<tr>
<td>The regional council on April 2, 2015, the U.S. EPA issued a letter of concurrence with the substitution of additional control measures with the equivalence of the substitution of additional control measures.</td>
<td>Y</td>
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