March 14, 2013

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

Dear Mr. Ikhrata:

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,

[Signature]

James N. Goldstene
Executive Officer

Enclosure

cc: See next page.
cc: Mr. Jared Blumenfeld  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
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Federal Transit Administration, Metropolitan Office  
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Los Angeles, California 90017

Lynn Terry  
Deputy Executive Office

Mr. Jason Crow  
Air Pollution Specialist  
Planning and Technical Support Division
The document was reviewed for public notice and opportunity for comment developed through a collaborative process that included the California Air Resources Board, Caltrans, the South Coast Air Quality Management District, the ACAG, and the TCM. The report was discussed by the TCM and additional control measures were proposed.

Summary:

<table>
<thead>
<tr>
<th>Year</th>
<th>Is Criterion satisfied?</th>
</tr>
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<tbody>
<tr>
<td>2013</td>
<td>Yes</td>
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The TCM for purchase of 77 buses and transit service expansion in Orange County, (on behalf of the Orange County Transportation Authority (OCFTA)) is examined. The proposal satisfies the requirements of the federal clean air act. The TCM was not replaced.

Date Reviewed by AOP: February 26, 2013

Reviewer: Jason Chow

Air Resources Board Staff Review of Substitution Transportation Control Measures Proposed by the Southern California Association of Government (SCAG)

Attachment
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.

| Y | 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. |

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