

December 9, 2022

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, California 90017

Dear Mr. Ajise:

California Air Resources Board (CARB or the Board) staff has reviewed the Main Street Bravo! Express project submitted by the Southern California Association of Governments (SCAG) as a substitute transportation control measure (TCM). CARB concurs that it meets the procedural and emission reduction requirements for substitution of a TCM in an approved State Implementation Plan (SIP). Enclosed with this letter is a table summarizing CARB staff's findings.

The federal Clean Air Act (CAA) specifies the procedures to substitute or add a TCM to an approved SIP. The CAA requires that the replacement TCM 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. In addition, the TCM must be developed through a collaborative process involving all affected jurisdictions, CARB, the United States Environmental Protection Agency (U.S. EPA), and the public.

The transportation conformity provisions of the CAA provide that our concurrence with SCAG's finding, together with the concurrence of the U.S. EPA Administrator, constitute the adoption of the TCM. The CAA further provides that the substitute measure(s) become part of the SIP by operation of law once adopted. This letter serves to transmit the substitute TCM to U.S. EPA for its concurrence and subsequent incorporation in the codified applicable SIP in accordance with the CAA. 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 Dr. Nesamani Kalandiyur, Manager, Transportation Analysis Section, at [Nesamani.Kalandiyur@arb.ca.gov](mailto:Nesamani.Kalandiyur@arb.ca.gov).

Sincerely,



Steven S. Cliff, Ph.D., Executive Officer

Enclosure

cc: See next page.

cc: Martha Guzman, Regional Administrator  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, California 95105

Elizabeth Adams, Director  
Air and Radiation Division, Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Vincent Mammano, Division Administrator  
California Division  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, California 95814

Wayne Nastri, Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765

Marlon Flournoy, Division Chief of Transportation Planning  
California Department of Transportation  
1220 N Street, MS-49  
Sacramento, California 95814

Darrell Johnson, Chief Executive Officer  
Orange County Transportation Authority  
550 S. Main Street  
Orange, California 92868

Nesamani Kalandiyur,  
Manager, Transportation Analysis Section  
Sustainable Transportation and Communities Division  
California Air Resources Board  
[Nesamani.Kalandiyur@arb.ca.gov](mailto:Nesamani.Kalandiyur@arb.ca.gov)

## Attachment

### California Air Resources Board Staff Review of Substitute Transportation Control Measures (TCMs) proposed by the Orange County Transportation Authority (OCTA) Substituting Two Committed TCM Projects for New Express Bus Service in the Orange County

Date Reviewed by CARB: November 2022 Reviewer: Kevin Hendrawan/Nesamani Kalandiyur		
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	Two transit projects were part of SCAG's 2020 Regional Transportation Plan (RTP) (Connect SoCal), 2021 Federal Transportation Improvement Program, and South Coast Air Quality Management District's 2016 South Coast Air Quality Management Plan. The intent of these projects was to 1) purchase and integrate 15 expansion paratransit vans and 2) construct and maintain a new Metrolink (Placentia Transit) station, but these have been significantly delayed in their implementation.  OCTA proposes to substitute these projects with a new 10-mile express bus service to be implemented by December 2022. Cumulatively, these proposed projects achieve equivalent or greater emission reductions concurrent with SCAG milestone years. <sup>1</sup>
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 original Paratransit Vehicle Expansion Project and Placentia Transit Station were to be open to traffic by 2022. <sup>2</sup> The substitute projects will be operational by December 2022, equivalent to the schedule of the previously committed TCMs. <sup>3</sup> Both the existing and substitute projects are located within the same geographic non-attainment area of Orange County.
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	OCTA has secured full funding for the substitute project primarily from Measure M2. Moreover, SCAG has the legal authority to implement the substitute project, while the project sponsor (OCTA) will have the authority to construct and operate it.

<sup>1</sup>According to the submitted TCM report, in 2022, the original TCM has an annual emissions reduction of 0 kilograms per day for ROG, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO, whereas the substitute TCM will have a total emissions reduction of 1.8 kilograms per day for ROG, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO. In 2045, the original TCM has a total emissions reduction of 0.1 kilograms per day for ROG, NO<sub>x</sub>, PM<sub>2.5</sub>, and CO, whereas the substitute TCM will have a total emissions reduction of 8.8 kilograms per day for ROG, NO<sub>x</sub>, PM<sub>2.5</sub>, and CO.

<sup>2</sup> [Connect SoCal Project List Technical Report Adopted on September 3, 2020](#), pg. 66, RTP ID: ORA030612; pg. 241, RTP ID: ORA130099

<sup>3</sup> Note that emissions reductions from the original TCM are not relied upon for reasonable further progress or attainment demonstration in the approved SIP.

<p>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).</p>	<p>Y</p>	<p>The proposed TCM substitution was presented by OCTA staff at SCAG's publicly noticed Transportation Conformity Working Group (TCWG)<sup>4</sup> meeting for initial interagency consultation on June 22, 2021. A revised TCM substitution analysis was presented to TCWG on February 22, 2022. A further refined TCM substitution analysis was presented to TCWG again on April 26, 2022.</p>
<p>The substitute and additional control measures were developed through a collaborative process that included reasonable public notice and opportunity for comment.</p>	<p>Y</p>	<p>The TCM substitution report was released for a 15-day public review period from May 6 through May 21, 2022, with no public comments received.</p>
<p>The metropolitan planning organization, State air pollution control agency, and the USEPA Administrator concur with the equivalency of the substitute or additional control measures.</p>	<p>Y</p>	<p>SCAG Regional Council adopted the TCM substitution and transmitted it to CARB and USEPA for concurrence. This letter documents only CARB's review and concurrence with the substitution. Upon CARB's concurrence, CARB will transmit to SCAG and communicate to USEPA for its determination.</p>

---

4 [Southern California Association of Governments - SCAG](#)