



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chair**  
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Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

August 26, 2015

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017

Dear Mr. Ikhata:

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

*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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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.

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cc: Mr. Jared Blumenfeld  
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Mr. Jermaine Hannon, Director  
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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.**

Date reviewed by ARB: August 4, 2015 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	A regional vanpool program in San Bernardino county is proposed to substitute for the expansion of two park and ride lots in the cities of Upland and Rialto. The vanpool program projects 128 new vanpools in 2016 and growing to 218 vanpools by 2025. The analysis provided by SCAG and SANBAG use EMFAC2011 emission rates and the vanpool method in <i>Methods to Calculate Cost Effectiveness of Air Quality Projects</i> (ARB 2013) to conclude that the regional vanpool program provides equivalent emission reductions to the park and ride lot expansion 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 park and ride expansion projects were scheduled for completion by December 2015. The vanpool program is expected to be operational by December 2016. The original TCM is not relied upon to demonstrate progress or attainment in the approved SIP. Both the original and substitute projects are within San Bernardino County in the South Coast Air Basin.
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 regional vanpool program will be implemented by SANBAG who has secured the necessary funding and has the legal authority under state law to implement, operate and monitor the replacement vanpool program.
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 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.
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 February 26, 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.

<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 April 2, 2015. The U.S. EPA is also expected to concur with the substitution. U.S. EPA's letter is expected in August 2015. This letter documents ARB's review and concurrence with the substitution.</p>
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