

August 23, 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 project submitted by the Southern California Association of Governments (SCAG) as a substitute transportation control measure (TCM). The replacement project would install three signal synchronization projects as a substitute for toll road expansion projects within Orange County.

The federal Clean Air Act (Act) specifies the procedures to substitute or add a TCM to an approved State Implementation Plan (SIP). The Act 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. 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.

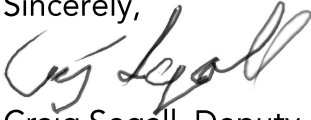
CARB has reviewed the analysis provided by SCAG for the proposed substitute TCM project and concurs that it meets the procedural and emission reduction requirements for substitution of a TCM in an approved SIP. Enclosed with this letter is a table summarizing CARB staff's findings.

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 the adoption of the TCM. The Act further provides that the substitute measure or measures 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 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.

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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,

A handwritten signature in black ink, appearing to read "Craig Segall". The signature is written in a cursive, flowing style.

Craig Segall, Deputy Executive Officer

Enclosure

cc: See next page.

cc: Martha Guzman, Regional Administrator  
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Darrell Johnson, Chief Executive Officer  
Orange County Transportation Authority  
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Orange, California 92868

Nesamani Kalandiyur, Manager, Transportation Analysis Section

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bcc: (external via e-mail with attachments)

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bcc: (internal with attachments)

Jennifer Gress, Chief, Sustainable Transportation and Communities Division

Carey Knecht, Chief, Transportation Systems and Planning Branch

Kevin Hendrawan, Air Resources Engineer, Transportation Analysis Section

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TCA TCM\letter

## Attachment

### California Air Resources Board Staff Review of Substitute Transportation Control Measures (TCMs) proposed by the Orange County Transportation Authority (OCTA) Substituting Three Committed TCM Projects for Three Signal Synchronization Projects in Orange County

Date Reviewed by CARB: July 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	Three Toll Road Capital Improvement Projects, operated by the Transportation Corridor Agencies (TCA), 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 was to install managed toll facilities along the San Joaquin Hills Transportation Corridor, the Foothill Transportation Corridor-North, and the Eastern Transportation Corridor, but these have been delayed beyond the scheduled completion dates.  OCTA proposes to substitute three signal synchronization projects (SSPs) (the Portola Parkway SSP, 1 <sup>st</sup> Street/Bolsa Avenue SSP, and Alton Parkway SSP) to be implemented by December 2022. Cumulatively, these proposed projects achieve equivalent or more 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 TCA Toll Road Capital Improvement Projects 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 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 with additional local funding. 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> In 2022, the original TCM has a total emissions reduction of 10.3 kilograms per day for ROG, NOx, PM2.5, and CO, whereas the substitute TCM will have a total emissions reduction of 25.9 kilograms per day for ROG, NOx, PM2.5, and CO. In 2045, the original TCM has a total emissions reduction of 49.2 kilograms per day for ROG, NOx, PM2.5, and CO, whereas the substitute TCM will have a total emissions reduction of 124.3 kilograms per day for ROG, NOx, PM2.5, and CO.

<sup>2</sup> [Connect SoCal Project List Technical Report Adopted on September 3, 2020](#), pg. 239, RTP IDs: 10254, ORA050, ORA051

<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 August 24, 2021. A revised TCM substitution analysis was presented to TCWG on February 22, 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>SCAG released the TCM substitution report for a 15-day public review period from March 7 through March 22, 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, through recommendation by SCAG's Energy and Environment Committee, adopted the TCM substitution report. This letter documents only CARB's review and concurrence with the substitution. As of this time, USEPA's concurrence status is unknown.</p>