



February 26, 2024

VIA ELECTRONIC SUBMISSION

Ms. Ginger Vagenas
U.S. Environmental Protection Agency (EPA), Region IX
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San Francisco, California 94105
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www.regulations.gov

**Subject: Docket ID No. EPA–R09– OAR–2023–0626
Joint Request for a 30-Day Extension of Comment Deadline on EPA Proposed
Action to Disapprove South Coast Air Quality Management District Final
Contingency Measure State Implementation Plan for the 1997 8-Hour Ozone
Standard in the South Coast Air Basin (89 Fed. Reg. 7320)**

Dear Ms. Vagenas:

The Southern California Association of Governments (SCAG), along with the six County Transportation Commissions (CTCs) in our region, including of the Imperial County Transportation Commission (ICTC), Los Angeles County Metropolitan Transportation Authority (Metro), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC), San Bernardino County Transportation Authority (SBCTA), and Ventura County Transportation Commission (VCTC), write to request a 30-day extension of the comment deadline on the above-referenced proposal (Docket ID No. EPA–R09– OAR–2023–0626). The proposal was published in the Federal Register (89 Fed. Reg. 7320) on February 2, 2024 with a current comment deadline of March 4, 2024. EPA is taking comments on the proposal and plans to follow with a final action.

SCAG is the nation’s largest metropolitan planning organization and council of governments for the six counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura and 191 cities in the SCAG region, which is home to a population of nearly 19 million people and powering the 16th largest economy in the world. SCAG is responsible for developing long-range, regional transportation plans and short-term, regional transportation improvement programs and providing broad-based representation of Southern California’s cities and counties. The six CTCs in

the SCAG region are responsible for identifying and implementing multi-modal transportation projects in their respective counties within the SCAG region.

If the disapproval is finalized as proposed, it has the potential to set in motion far-reaching consequences on critical aspects of our region's regional transportation planning, programming, project implementation, and the region's economy. The current 31-day comment period is too short to allow for careful analysis and thoughtful comments on the disapproval's implications for the SCAG region and beyond. Therefore, we respectfully request a 30-day extension of the comment deadline to April 3, 2024.

Our agencies fully support and advocate for clean air. This 30-day extension provides us and other stakeholders with a robust and fair opportunity to prepare meaningful comments that could inform EPA's final action or additional pathways besides full disapproval. The significant implications of proposed disapproval warrant fuller consideration and require more time than the currently provided 31 days.

Finally, EPA is bound by a proposed court-ordered deadline to finalize action by July 1, 2024 (89 Fed. Reg. 3396), and that proposed deadline is relevant to EPA's decision of whether to extend the comment deadline for the proposed disapproval. We believe the requested 30-day extension would still allow sufficient time (89 days) for EPA to complete the rulemaking process by July 1, 2024.

We appreciate your consideration of this request and respectfully urge EPA to act quickly to extend the deadline. Please contact Sarah Jepson, Chief Planning Officer, SCAG, at jepson@scag.ca.gov or (213) 236-1955 if you have questions regarding this request.

Sincerely,



Kome Ajise
Executive Director
Southern California Association of
Governments



David Aguirre
Executive Director
Imperial County Transportation Commission



Martin Erickson
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CC: Martha Guzman, EPA Region IX
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