

Enclosure
Transportation Conformity Adequacy Review
Imperial County 8-hour Ozone Early Progress Plan

Adopted February 28, 2008, Submitted March 24, 2008

Adequacy Review Criteria (40 CFR part 93)		Is Criterion Satisfied?	Reference in SIP document/comments
Sec. 93.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing by the State.	Y	The March 24, 2008 transmittal letter submitting the plan was sent by CARB's Executive Director, James Goldstene, the governor's designee. The transmittal letter indicates that CARB formally adopted the plan on February 28, 2008 through a Board Resolution (08-10). The Board Resolution also discussed CARB's authority as the State agency responsible for the preparation of any SIP as required by the Act (40 CFR 93.118(e)(4)(i)). CARB released the plan on January 29, 2008 and requested public comments by February 27, 2008 or at the public hearing held on February 28, 2008.
Sec. 93.118(e)(4)(ii)	The plan was developed through consultation with federal, state and local agencies; full implementation plan documentation was provided to EPA and EPA's stated concerns, if any, were addressed.	Y	Documentation accompanying the plan describes a public and agency outreach effort. See Background section of the plan, the notice of public hearing announcement, and the attachment providing proof of publication of public hearing announcement. The plan was presented to agencies participating in the Southern California Associated of Governments Transportation Conformity Working Group meeting on January 22, 2008. Agencies included in that consultation workgroup include federal agencies (EPA, FHWA, FTA), state (CARB, Caltrans), regional (Air Quality Management Districts, SCAG) and subregional agencies (County Transportation Commissions). EPA provided comments on drafts of the plan and EPA's comments were addressed.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budgets are clearly identified and	Y	The budgets for Imperial County are clearly identified and summarized on page 12 of the plan. The motor vehicle emissions budgets are broken out by on-road emissions and off model

	precisely quantified.		reductions to determine the net on-road emissions for the conformity budget. The budgets were determined using EMFAC2007 emission factors with motor vehicle activity provided by the Southern California Association of Governments in January 2008. The Appendix shows the adjustments that were made to vehicle activity.
Sec. 93.118(e)(4)(iv)	The motor vehicle emissions budgets, when considered together with all other emission sources, are consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given plan).	Y	EPA has preliminarily concluded that the submitted SIP demonstrates progress in the Imperial County area and that the motor vehicle emissions budgets are consistent with that demonstration. The progress between the base year (2002) and the budget year (2009) is shown on page 11 of the plan.
Sec. 93.118(e)(4)(v)	The plan shows a clear relationship between the emissions budgets, control measures and the total emissions inventory.	Y	The VOC and NOx emission inventories for stationary, area, on-road mobile and other mobile sources for 2002 and 2009 are contained on page 11 of the plan. More detailed emissions inventories are provided in the Appendix.
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted control strategy or maintenance plans explain and document any changes to any previous submitted budgets and control measures; impacts on	Y	There is no approved SIP or emissions inventory for the Imperial County ozone nonattainment area. The current plan includes motor vehicle emission inventories that were prepared using the latest version of EMFAC2007. EMFAC2007 was approved by EPA in January 2008 (73 FR 3464, January 28, 2008) and details the basis for the changes to the emission factors. This plan provides the first set of 8 hour ozone budgets for the area. Consistent with the 2004 final amendments to the Transportation Conformity Rule (69 FR 4004) these 8-hour motor vehicle emissions budgets replace any

	point and area source emissions; any changes to established safety margins (see 93.101 for definition), and reasons for the changes (including the basis for any changes to emission factors or estimates of vehicle miles traveled).		existing 1-hour motor vehicle emission budgets.
Sec. 93.118(e)(5)	EPA has reviewed the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan.	Y	CARB compiled public comments submitted during the February 28, 2008 hearing and during the public comment periods. These comments and the responses are included as attachment to the plan. We have reviewed the compilation of comments and responses and find CARB's responses to be acceptable. No issues that might have affected our adequacy finding remain unanswered.
Reviewer: Adrienne Priselac			Date of Review: April 9, 2008