



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

APR 01 2016

Richard W. Corey, Executive Officer
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

Re: Adequacy Status of San Joaquin Valley 2012 PM_{2.5} Moderate Area Attainment Plan Motor Vehicle Emissions Budgets

Dear Mr. Corey:

We have found adequate for transportation conformity purposes the motor vehicle emissions budgets (MVEBs or “budgets”) for fine particulates (PM_{2.5}) and nitrogen oxides (NO_x) in the 2012 San Joaquin Valley Moderate Area Plan, as revised in a December 29, 2014 submittal, for the 2006 24-hour PM_{2.5} national ambient air quality standards (NAAQS) (“2012 PM_{2.5} Plan” or “Plan”).¹ Our finding will be effective fifteen days after publication in the Federal Register. After the effective date, the SJV metropolitan planning organizations and the U.S. Department of Transportation must use the adequate budgets in future transportation conformity analyses.

On October 7, 2014, we received a letter from the California Air Resources Board (CARB) stating that it intended to revise the previously-submitted 2014 and 2017 budgets in the 2012 PM_{2.5} Plan to remove emissions reductions resulting from implementation of the Carl Moyer and Prop 1B incentive grant programs to make the budgets consistent with the 2012 PM_{2.5} Plan’s reasonable further progress (RFP) demonstration. Following CARB’s adoption of the revised budgets on November 20, 2014, CARB submitted the revised budgets to EPA on December 29, 2014 as a revision to the California State Implementation Plan (SIP). The revision identified budgets for direct PM_{2.5} and NO_x for the RFP milestone years of 2014 and 2017 for each of the eight SJV-area counties and a total budget for the nonattainment area.

In response to CARB’s request for parallel processing, we announced the availability of the Plan and related budgets on the EPA’s MVEB adequacy website on October 23, 2014, and requested public comments by November 24, 2014.² We received no comments on the budgets and Plan during this period. We did, however, receive two comments on the budgets when we

¹ The SJV’s Plan to address moderate area requirements for the 2006 PM_{2.5} NAAQS consists of three submittals: the 2012 PM_{2.5} Plan (submitted March 4, 2013), the 2014 Supplement (submitted November 6, 2014), and the revised MVEBs (submitted December 29, 2014).

² <http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm>.

proposed action on the 2012 PM_{2.5} Plan and 2014 Supplement on January 13, 2015.^{3,4} We respond to the first of these two comments on MVEBs in the notice of adequacy accompanying this letter. The second comment concerns the transportation conformity interpollutant trading mechanism in the 2012 PM_{2.5} Plan that we proposed to approve for use in transportation conformity analyses. We will respond to this comment when we take final action on the interpollutant trading mechanism as part of our final action on the 2012 PM_{2.5} Plan. The interpollutant trading mechanism cannot be used until it is approved as part of the SIP. Therefore, the appropriate venue for responding to the comment on the trading mechanism is the final rule on the 2012 PM_{2.5} Plan and 2014 Supplement.

This letter transmits our decision that the motor vehicle emissions budgets for 2014 and 2017 contained in the 2012 PM_{2.5} Plan, as revised in the December 29, 2014 submittal, are adequate for transportation conformity decisions. In reaching this decision, we have reviewed the 2012 PM_{2.5} Plan, including responses to public comments on the Plan, and have determined that the related MVEBs, when considered with all other emissions sources in the SJV PM_{2.5} nonattainment area, are consistent with applicable requirements for RFP toward attainment of the 2006 PM_{2.5} NAAQS. These budgets are consistent with the Plan's RFP demonstrations for milestone years 2014 and 2017 and are based on control measures that have already been adopted and implemented. The budgets also meet the other adequacy criteria in 40 CFR 93.118(e)(4). The adequate budgets are as follows:

Adequate Budgets in the San Joaquin Valley for the 2006 PM_{2.5} Standards (winter daily average in tons)				
County	2014		2017	
	PM _{2.5}	NO _x	PM _{2.5}	NO _x
Fresno	1.0	31.6	0.9	25.2
Kern (SJV)	1.2	43.2	1.0	34.4
Kings	0.2	8.8	0.2	7.2
Madera	0.3	8.7	0.2	7.0
Merced	0.5	17.2	0.4	13.7
San Joaquin	0.7	20.0	0.6	15.9
Stanislaus	0.5	15.1	0.5	12.0
Tulare	0.5	14.3	0.4	10.7
Total*	4.9	159.0	4.3	126.0

³ See 80 FR 1816, January 13, 2015.

⁴ See letter dated February 27, 2015 from Paul Cort and Adenike Adeyeye, Earthjustice, to Wienke Tax, Air Planning Office, US EPA Region 9.

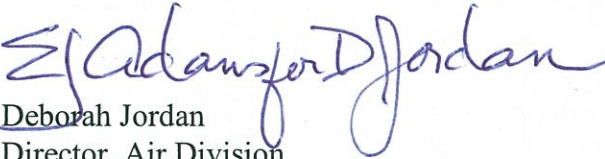
Source: Letter, Richard Corey, Executive Officer, CARB, to Jared Blumenfeld, Regional Administrator, Region 9, dated December 29, 2014, Staff Report, Appendix A, Table C-4.

*Totals reflect disaggregated emissions and may not add exactly as shown here due to rounding. See Letter, Richard Corey, Executive Officer, CARB, to Jared Blumenfeld, Regional Administrator, Region 9, dated December 29, 2014, with Attachment, revised Table C-4, "Transportation Conformity Budgets" to 2012 PM_{2.5} Plan.

We have enclosed a table that documents the details of our adequacy determination. This information will soon be posted on the Internet at: <http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm>. We will also announce this adequacy determination in the Federal Register. The determination will become effective 15 days after the Federal Register announcement pursuant to 40 CFR 93.118(f).

If your staff has any questions, they may contact Kerry Drake at (415) 947-4157 or Wienke Tax at (415) 947-4192.

Sincerely,


Deborah Jordan
Director, Air Division

Enclosure

cc: Ted Matley, FTA
Jack Lord, FHWA
Cecilia Crenshaw, FHWA
Scott Carson, FHWA
Shalanda Christian, Caltrans
Rodney Tavitas, Caltrans
Tony Boren, Fresno Council of Governments
Ahron Hakimi, Kern Council of Governments
Terri King, Kings County Association of Governments
Patricia Taylor, Madera County Transportation Commission
Marjorie Kirn, Merced County Association of Governments
Andrew Chesley, San Joaquin Council of Governments
Rosa De Leon Park, Stanislaus Council of Governments
Ted Smalley, Tulare County Association of Governments

Enclosure 1: Transportation Conformity Adequacy Review

Control Strategy State Implementation Plan (SIP) Under Review: San Joaquin Valley Moderate Area Plan for the 2006 24-hour PM _{2.5} NAAQS (December 2012) ("2012 PM _{2.5} Plan" or "Plan")		Date of SIP Revision Receipt by the EPA: December 29, 2014	
Reviewer: Wienke Tax	Date: March 10, 2016	Reference in SIP Document/Comments	
Adequacy Review Criteria (40 CFR part 93)	Is Criterion Satisfied?	The original budgets were noticed for public hearing. See San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) Governing Board Resolution, page 4. CARB also provided the required public notice and opportunity for public comment prior to its January 24, 2013 public hearing on the Plan. See Notice of Public Meeting to Consider Approving the San Joaquin Valley PM _{2.5} State Implementation Plan and Overview of PM _{2.5} Science and Research, December 4, 2012. CARB provided the required public notice and opportunity for public comment on October 20, 2014, prior to the November 20, 2014 public hearing on the revised budgets. See http://www.arb.ca.gov/planning/sip/sjvpm25/2014updates/publicnotice.pdf . The December 29, 2014 transmittal letter submitting the revised budgets associated with the 2012 PM _{2.5} Plan was sent by CARB's Executive Officer, Richard Corey, the Governor's designee. See also CARB Board Resolution 14-40, dated November 20, 2014, adopting the revised transportation conformity budgets for the 2012 PM _{2.5} Plan.	
Sec. 93.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing.	Y	

Enclosure: Transportation Conformity Adequacy Review

<p>Sec. 93.118(e)(4)(ii)</p>	<p>The plan was developed through consultation with federal, state and local agencies; full implementation plan documentation was provided and the EPA's stated concerns, if any, were addressed.</p>	<p align="center">Y</p>	<p>The 2012 PM_{2.5} Plan was developed through consultation with federal, state and local agencies which took place with the SJV interagency consultation working group (the Model Coordinating Committee). Members of the consultation group include: EPA, FHWA, FTA, CARB, Caltrans, the SJVUAPCD, and each county's metropolitan planning organizations (MPO). The EPA received a copy of the draft 2012 PM_{2.5} Plan and provided written comments. See Letter, date October 19, 2012, Kerry Drake, Associate Director, Air Division EPA-Region 9 to Samir Sheikh, SJVUAPCD. Comments were addressed by the SJVUAPCD. See 2012 PM_{2.5} Plan, Appendix I. The revised budgets were developed through consultation between the EPA, CARB, and the SJV MPOs.</p>
<p>Sec. 93.118(e)(4)(iii)</p>	<p>The motor vehicle emission budgets are clearly identified and precisely quantified.</p>	<p align="center">Y</p>	<p>The budgets for 2014 and 2017 are clearly identified and precisely quantified in Appendix C (pp. C-36 and C-37)) of the 2012 PM_{2.5} Plan. These budgets reflect control measures that were already adopted at the time the CARB adopted the 2012 PM_{2.5} Plan in January 2013. 2012 PM_{2.5} Plan, Appendix C. Revisions to the budgets are clearly identified and precisely quantified. See letter, Richard Corey, Executive Officer, CARB, to Jared Blumenfeld, Regional Administrator, EPA Region 9, dated December 29, 2014, with Staff Report, submitting revised PM_{2.5} Plan budgets. Table C-4 in Appendix A of the Staff Report in the December 29, 2014 submittal contains more detailed information about emissions reductions incorporated into the MVEBs.</p>

Enclosure: Transportation Conformity Adequacy Review

<p>Sec. 93.118(e)(4)(iv)</p>	<p>The motor vehicle emissions budget(s), when considered together with all other emission sources, is consistent with applicable requirements for reasonable further progress and attainment.</p>	<p align="center">Y</p> <p>The EPA has concluded that the revised budgets for the year 2014 and 2017, when considered together with all other emission sources, are consistent with the requirement to demonstrate reasonable further progress for the 2006 PM_{2.5} standard. The RFP demonstration in the 2012 PM_{2.5} Plan is on pages 9-4 through 9-7 of Chapter 9 of the Plan.</p> <p>The EPA has concluded that the 2012 PM_{2.5} Plan demonstrates the impracticability of attainment of the 2006 PM_{2.5} standard by the SJV's Moderate area attainment date, which was December 31, 2015. Because the 2012 PM_{2.5} Plan does not demonstrate attainment, no attainment year budgets are necessary.</p> <p>The revised budgets for direct PM_{2.5} do not include emissions from re-entrained road dust (paved and unpaved) or road/transit construction activities. The State concluded that neither are significant contributors to PM_{2.5} emissions or ambient PM_{2.5} levels above the standard in the SJV. See 2012 PM_{2.5} Plan, Appendix C, section C.11.2. The EPA agrees that neither re-entrained road dust nor road/transit construction activities is a significant contributor to PM_{2.5} ambient concentrations in the SJV.</p> <p>The 2012 PM_{2.5} Plan does not include budgets for the PM_{2.5} precursor sulfur dioxide (SO₂) because on-road vehicle emissions of SO₂ are projected to be an insignificant contributor to PM_{2.5} levels in the SJV in both 2014 and 2017. See 2012 PM_{2.5} Plan, Appendix C, section C.11.2. The EPA concurs that on-road SO₂ emissions are an insignificant contributor to PM_{2.5} levels in the SJV.</p> <p>The 2012 PM_{2.5} Plan does not include budgets for the PM_{2.5} precursors volatile organic compounds (VOC) because VOC is not considered to contribute significantly to elevated PM_{2.5} levels in the SJV. See 2012 PM_{2.5} Plan, Appendix C, section C.11.2. The EPA concurs that on-road VOC emissions are an insignificant contributor to PM_{2.5} levels in the SJV. See section I.I.C. of this TSD.</p> <p>The Plan does not address the significance of ammonia for motor vehicle emissions budget purposes. Total on-road ammonia emissions, however, account for only 1.2 percent of the total ammonia emissions in the SJV (2012 PM_{2.5} Plan, Appendix B, Table B-5). Consistent with section 93.102(b)(2)(v), the EPA has proposed to find that on-road ammonia emissions are not significant contributors to PM_{2.5} levels in the SJV.</p>
------------------------------	--	---

Enclosure: Transportation Conformity Adequacy Review

<p>Sec. 93.118(e)(4)(v)</p>	<p>The plan shows a clear relationship among the emissions budget(s), control measures and the total emissions inventory.</p>	<p align="center">Y</p>	<p>The emissions inventory for all stationary, area, on-road mobile, and non-road mobile sources, and their relation to control measures and the reductions from existing measures are described in Appendices B, C, and D of the 2012 PM_{2.5} Plan. The final inventories incorporating the reductions from adopted measures are given in Tables B-1 through B-5 in Appendix B to the 2012 PM_{2.5} Plan. Paved dust emissions were revised to reflect VMT rather than centerline miles calculations. <i>See</i> letters, Lynn Terry, Deputy Executive Officer, CARB, to Deborah Jordan, Director, Air Division, EPA Region 9, dated September 22, 2014, and Jonathan P. Taylor, Chief, Transportation Planning Branch, CARB to Matt Lakin, Chief, Air Planning, EPA Region 9, dated October 8, 2014.</p>
<p>Sec. 93.118(e)(4)(vi)</p>	<p>Revisions to previously submitted control strategy or maintenance plans explain and document any changes to any previous submitted budgets and control measures; impacts on 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).</p>	<p align="center">Y</p>	<p>These previously submitted budgets were revised to remove reductions from the State's Carl Moyer and Prop 1B incentive grants program to be consistent with the RFP demonstration in the Plan. <i>See</i> letter, Richard Corey, Executive Officer, CARB, to Jared Blumenfeld, Regional Administrator, EPA Region 9, dated October 7, 2014, with attachment, submitting revised 2012 PM_{2.5} Plan budgets. The EPA approved budgets for the 1997 PM_{2.5} standards on November 9, 2011 (76 FR 69896, 69923). Those budgets continue to apply in the SJV for demonstrating conformity for the 1997 PM_{2.5} annual and 24-hour standards.</p>
<p>Sec. 93.118(e)(5)</p>	<p>The EPA has reviewed the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan.</p>	<p align="center">Y</p>	<p>The 2012 PM_{2.5} Plan contains summaries of the public comments received (both written and oral) and SJVAPCD's responses to all comments in Appendix I to the Plan. We have reviewed the compilation of comments and responses. No issues that might have affected our adequacy finding remain unanswered.</p>