



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

April 23, 2010

James Goldstene, Executive Officer
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

RE: Adequacy Status of San Joaquin Valley PM_{2.5} Reasonable Further Progress and Attainment Plan Motor Vehicle Emissions Budgets

Dear Mr. Goldstene:

We have found adequate for transportation conformity purposes certain motor vehicle emissions budgets (MVEBs) in the *San Joaquin Valley 2008 PM_{2.5} Plan* ("SJV PM_{2.5} Plan") as adopted by the San Joaquin Valley Air Pollution Control District on April 30, 2008 and by the California Air Resources Board (CARB) on May 22, 2008. As a result of our adequacy finding, Metropolitan Planning Organizations (MPOs) in the San Joaquin Valley and the U.S. Department of Transportation must use the adequate budgets in future conformity analyses once the finding becomes effective.

CARB submitted the SJV PM_{2.5} Plan on to EPA on June 30, 2008 as a revision to the California State Implementation Plan (SIP). The plan includes new control measures and demonstrations of reasonable further progress (RFP) and attainment for the 1997 annual and 24-hour PM-2.5 national ambient air quality standards. The plan identifies subregional MVEBs, applicable for both the annual and 24-hour PM_{2.5} standard, for each county in the nonattainment area for PM_{2.5} and nitrogen oxides (NO_x) for the RFP milestone years of 2009 and 2012 and for the attainment year of 2014. We announced receipt of the plan on the Internet on August 19, 2008, and requested public comment by September 18, 2008. We received no comments on the budgets and plan during this comment period.

This letter transmits our decision that the motor vehicle emissions budgets for 2009 and 2012 as contained in the SJV PM_{2.5} Plan are adequate for transportation conformity decisions. These budgets are consistent with the State's RFP demonstrations for milestone years of 2009 and 2012, and these budgets are based on control measures that have already been adopted and implemented. The budgets also meet the other adequacy criteria, therefore, these budgets meet the transportation conformity adequacy criteria found in 40 CFR 93.118(e)(4). The adequate budgets which apply to both the annual and 24-hour PM_{2.5}, for each county in the nonattainment area, are as follows:

SJV PM2.5 Plan Motor Vehicle Emissions Budgets Found Adequate (annual average, tons per day)				
	2009		2012	
	PM2.5	NO _x	PM.25	NO _x
Fresno	2.2	56.5	1.9	44.2
Kern (SJV)	3.4	87.7	3.0	74.2
Kings	0.7	17.9	0.6	14.6
Madera	0.6	14.1	0.5	11.4
Merced	1.5	33.6	1.2	26.7
San Joaquin	1.6	39.1	1.4	32.8
Stanislaus	1.0	25.8	0.9	20.8
Tulare	0.9	23.3	0.8	19.5

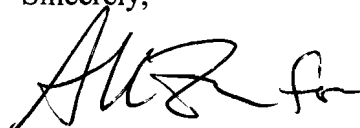
This letter also transmits our finding that the motor vehicle emissions budgets for the attainment year of 2014 are inadequate for transportation conformity purposes. These 2014 budgets include estimated emission reductions associated with a number of commitments for future rule adoption. Although these rules, for the most part, have been adopted and in aggregate achieve the expected reductions, the State has not yet revised the budgets to reflect the precise reductions expected from the adopted rules. Without these revisions, the 2014 budgets in the SJV PM2.5 Plan are not precisely quantified or related to the overall emissions inventory and other measures and therefore, they do not meet the adequacy criteria found in 40 CFR 93.118(e)(4)(iii), (iv), and (v).

SJV PM2.5 Plan Motor Vehicle Emissions Budgets Found Inadequate (annual average, tons per day)		
	2014	
	PM2.5	NO _x
Fresno	1.1	26.0
Kern (SJV)	1.4	41.6
Kings	0.3	8.1
Madera	0.3	6.7
Merced	0.6	14.8
San Joaquin	0.9	20.3
Stanislaus	0.5	12.4
Tulare	0.5	12.2

We have detailed our adequacy/inadequacy findings in the enclosures. A copy of this letter and its enclosures will soon be posted on the Internet at <http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm>. We will also announce the adequacy findings in the Federal Register. The findings will become effective 15 days after the Federal Register announcement pursuant to 40 CFR 93.118(f).

If you have any questions regarding these adequacy findings or would like copies of the comments received, please contact Kerry Drake at (415) 947-4157 or Frances Wicher at (415) 972-3957.

Sincerely,

A handwritten signature in black ink, appearing to read "AJR for", written over a horizontal line.

Deborah Jordan
Director, Air Division

Enclosure

cc: Errol Villegas, SJVUAPCD
Tony Boren, Fresno COG
Ronald Brummett, Kern COG
Terri King, Kings COG
Patricia Taylor, Madera CTC
Jesse Brown, Merced COG
Andrew Chesley, SJCOG
Vince Harris, Stanislaus, COG
Ted Smalley, Tulare COG
Sue Kaiser, FHWA
Ted Matley, FTA

Enclosure 1: Transportation Conformity Adequacy Review

Control Strategy State Implementation Plan (SIP) Under Review: San Joaquin Valley (SJV) 2008 PM2.5 Plan: Reasonable Further Progress and Attainment Plan (April 2008)		Date of SIP Revision Receipt by EPA: June 2008	
Reviewers: Frances Wicher		Date: 1/15/10	
Adequacy Review Criteria (40 CFR part 93)		Is Criterion Satisfied?	Reference in SIP Document/Comments
Sec. 3.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing.	Y	The June 30, 2008 transmittal letter submitting the SJV 2008 PM2.5 Plan was sent by CARB's Executive Officer, James Goldstene, the Governor's designee. The transmittal letter indicates that the CARB formally adopted the plan on May 22, 2008 through a Board Resolution (08-28). CARB released the plan on April 25, 2008 and requested public comments by May 21, 2008 or at the public hearing held on May 22, 2009. The plan relies upon reduction commitments from the 2007 State Strategy, which was previously submitted to EPA as a SIP revision on November 16, 2007. CARB released the 2007 State Strategy on April 26, 2007 and May 7, 2007 and requested public comments by the public hearing held on September 27, 2007.
Sec. 93.118(e)(4)(ii)	The plan was developed through consultation with federal, state and local agencies; full implementation plan documentation was provided and EPA's stated concerns, if any, were addressed.	Y	Consultation with federal, state and local agencies was undertaken; this consultation took place with the San Joaquin Valley interagency consultation working group (the Model Coordinating Committee). Members of the consultation group include: EPA, FHWA, FTA, CARB, Caltrans, the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD), and each county's Metropolitan Planning Organization (MPO). EPA received a copy of the draft SJV 2008 PM2.5 Plan and draft State Strategy but provided no written comments.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budgets are clearly identified and precisely quantified.	Y / N	The motor vehicle emissions budgets for 2009 and 2012 are clearly identified and precisely quantified on page 7-8 of the plan and in Appendix C. These budgets reflect control measures that were already adopted and implemented at the time the SJVAPCD adopted the plan on April 30, 2008. The budgets for 2014 are not precisely quantified because they reflect CARB's commitments to reduce emissions of PM2.5 and NOx in the SJV. While CARB (and the California Bureau of Automotive Repair (BAR)) has now adopted rules to achieve these reductions, it has not revised the 2014 budgets to reflect the precise emissions

			reductions expected from each of these rules.
Sec. 93.118(e)(4)(iv)	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.	Y / N	<p>EPA has preliminarily concluded that the budgets for the years 2009 and 2012, when considered together with all other emission sources, are consistent with the requirement to demonstrate reasonable further progress for the annual and 24-hour PM2.5 standards. This finding is based on review of the plan's RFP demonstrations in Chapter 8 which show a generally linear reduction in emissions as required by EPA's PM2.5 implementation rule (See 40 CFR 51.1009). Other relevant materials include the District's control measure strategy in chapter 6 of the SJV PM2.5 Plan. The attainment year 2014 motor vehicle emissions budgets reflect emission reductions from CARB commitments to achieve PM2.5 and NOx reductions in the SJV and not from specified control measures that have been drafted or adopted in regulatory form. As discussed before, CARB (and BAR) have adopted rules that will achieve these reductions but has not yet revised the budgets to reflect the precise emissions reductions expected from each of the adopted rules.</p> <p>The MVEBs for PM2.5 do not include emissions from re-entrained road dust (paved and unpaved) or road/transit construction activities because neither are significant contributors to PM2.5 emissions in the SJV. See SJV PM2.5 plan, pp. 7-5 & 7-6.</p> <p>The SJV PM2.5 Plan includes budgets only for directly emitted PM2.5 and NOx. It does not include budgets for the other potential PM2.5 precursors because on-road vehicles are an insignificant contributor to PM2.5 levels in the SJV (sulfur dioxide and volatile organic compounds) or controls on them would be ineffective at reducing PM2.5 levels in the SJV (ammonia). See SJV PM2.5 plan, pp. 7-4 & 7-5.</p>
Sec. 93.118(e)(4)(v)	The plan shows a clear relationship among the emissions budget(s), control measures and the total emissions inventory.	Y/ N	The emission inventory for all stationary, area, on-road mobile, and nonroad mobile sources, and their relation to control measures and the reductions from existing measures are described in Appendix A of 2007 State Strategy. The final inventories incorporating the reductions from existing measures are given in Tables B-1 and B-2 in Appendix B to the SJV 2008 PM2.5 Plan. As stated elsewhere, the 2014 budgets incorporate emissions reduction commitments from the State's strategy and the State has not revised the budgets to reflect the reductions from measures that have been adopted to fulfill these commitments.
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted control strategy or maintenance plans explain and document any changes to	N/A	There are no previously submitted budgets. The SJV 2008 PM2.5 Plan is the first plan submitted by California to address PM2.5 standards in the SJV

	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).		
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	The 2008 PM2.5 Plan contains public comments and SJVUAPCD responses in appendix J to the plan. Additional verbal comments were received during the adoption public hearings held by the SJVUAPCD and CARB and are also included as attachments to the November 2007 SIP submittal. We have reviewed the compilation of comments and responses and find the responses to be acceptable. No issues that might have affected our adequacy finding remain unanswered.