



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

February 14, 2006

Leo M. Drozdoff, P.E.
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

Dear Mr. Drozdoff:

We have found adequate for transportation conformity purposes the motor vehicle emissions budgets in the *Redesignation Request and Maintenance Plan for the Truckee Meadows Carbon Monoxide Non-Attainment Area* (September 2005) ("Truckee Meadows CO Redesignation Request and Maintenance Plan"). As a result of our adequacy finding, the Washoe County Regional Transportation Commission and the U.S. Department of Transportation must use these budgets in future conformity analyses.

On March 2, 1999, the United States Court of Appeals for the District of Columbia Circuit issued a decision on *Environmental Defense Fund v. Environmental Protection Agency*, No. 97-1637, that we must make an affirmative determination that the submitted motor vehicle emissions budgets contained in State Implementation Plans (SIPs) are adequate before they are used to determine the conformity of Transportation Improvement Programs or Long Range Transportation Plans. In response to the court decision, we make any submitted SIP revision containing a control strategy or maintenance plan available for public comment and respond to these comments before announcing our adequacy determination. The conformity rule was revised to reflect the procedures we have been using since the court decision. See 69 FR 40004 (July 1, 2004) and related correction notice at 69 FR 43325 (July 20, 2004).

On September 22, 2005, the Washoe County District Board of Health adopted the 2005 Truckee Meadows CO Redesignation Request and Maintenance Plan that was developed to provide for maintenance of the carbon monoxide (CO) national ambient air quality standard (NAAQS) in Truckee Meadows for ten years beyond redesignation. On November 4, 2005 the Nevada Division of Environmental Protection (NDEP) submitted this plan to EPA. The plan identifies motor vehicle emissions budgets for Truckee Meadows in pounds of CO per typical CO season day of 330,678 for year 2010 and 321,319 for year 2016. On November 30, 2005, we announced receipt of the plan on the Internet and requested public comment by December 30, 2005. We received no comments on the plan during that comment period.

This letter transmits our decision that the motor vehicle emissions budgets in the 2005 Truckee Meadows CO Redesignation Request and Maintenance Plan are adequate for transportation conformity decisions. In reaching this decision, we have reviewed the plan and have preliminarily determined that it will meet the requirements for maintenance plans under the Clean Air Act and provide for maintenance of the CO NAAQS in the Truckee Meadows area of Washoe County.

We have enclosed a table that summarizes our adequacy determination. We will soon post this information on the Internet at: <http://www.epa.gov/otaq/transp/conform/reg9sips.htm>
We will also announce this adequacy determination in the Federal Register. This determination will become effective 15 days after the Federal Register announcement.

If you have any questions regarding this decision, please contact Eleanor Kaplan of my staff at (415) 947-4147.

Sincerely,



Deborah Jordan
Director, Air Division

Enclosure (Adequacy Review)

cc: Andrew Goodrich, Director, Air Quality Management Division
Washoe County District Health Department
Daniel Inouye, Washoe County District Health Department
Greg Krause, Executive Director, Washoe County Regional Transportation Commission
Kent Cooper, Assistant Director, Planning, Nevada Department of Transportation
Randy Bellard, Planning Research Engineer, Federal Highway Administration

Transportation Conformity Adequacy Review

Maintenance SIP under Review: Truckee Meadows Carbon Monoxide Redesignation Request and Maintenance Plan		Date of SIP Revision Receipt by EPA: 11/04/2005	
Reviewer: Eleanor Kaplan, Karina O'Connor, Jefferson Wehling		Date: 01/27/06	
Adequacy Review Criteria		Is Criterion Satisfied? Y/N	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.	Y	The Truckee Meadows Redesignation Request and Maintenance Plan was submitted on November 4, 2005 by the Administrator of the Nevada Division of Environmental Protection (NDEP), the Governor of Nevada's designee for all SIP revision submittals to EPA. This SIP submittal documents that the Washoe County District Board of Health, which is responsible for implementation of air quality management programs within the boundaries of Washoe County, which includes Truckee Meadows, held a public hearing on the plan on September 22, 2005, and adopted the plan on that same date.

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Reviewers: Eleanor Kaplan, Karina O'Connor, Jefferson Wehling		Date: 01/27/06	
Adequacy Review Criteria		Is Criterion Satisfied ? Y/N	Reference in SIP Document / Comments
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	We understand that the plan was developed through consultation with State and local agencies, such as NDEP and the Regional Transportation Commission. With respect to Federal agencies, Washoe County District Health Department staff provided EPA Region IX staff with a copy of the administrative draft Redesignation Request and Maintenance Plan. Issues raised by EPA Region IX staff on the administrative draft were addressed through this process prior to publication of the proposed plan for public review.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	The motor vehicle emission budgets are clearly identified and precisely quantified for years 2010 and 2016 on page 21 of the Redesignation Request and Maintenance Plan.

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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 (RFP), attainment, or maintenance (whichever is relevant to the given plan).	Y	The Redesignation Request and Maintenance Plan describes how the level of emissions contained in the motor vehicle emission budgets, with all other emission sources and with identified safety margins, will show maintenance through the year 2016. See pages 21 and 22 of the plan for a discussion of the derivation of the motor vehicle emissions budgets and how they are consistent with the maintenance demonstration provided on pages 18 through 20 of the plan.

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Sec. 93.118(e)(4)(v)	The plan shows a clear relationship between the emissions budget(s), control measures and the total emissions inventory.	Y	The emission inventory for all point, area and motor vehicle sources, and its relation to control measures, is described on page 20 of the plan. Documentation for the baseline (2002) emissions inventory is contained in a separate SIP submittal (dated February 3, 2005) but the basis for future year projections is contained in the submitted plan. Emissions reductions attributed to individual control measures are shown on page 7 of the plan.

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Adequacy Review Criteria		Is Criterion Satisfied? Y/N	Reference in SIP Document / Comments
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 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).	Y	As a "moderate" CO nonattainment area with a design value less than 12.7 ppm at the time of classification, the State of Nevada was not required to submit a control strategy (attainment or RFP) plan for Truckee Meadows. Thus, there are no submitted or approved control strategy budgets for Truckee Meadows. The CO budgets in the submitted Redesignation Request and Maintenance Plan would be the first to be established for the Truckee Meadows area.

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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 SIP submittal documents that the Washoe County District Board of Health held a public hearing to consider the Redesignation Request and Maintenance Plan on September 22, 2005. Notice of this public hearing was published in the Reno Gazette-Journal on several days beginning August 19, 2005. Two written comment letters were submitted and are included with the SIP submittal. Both letters are in support of the redesignation request and the maintenance plan. No comments were made by members of the public at the hearing itself.

Enclosure 1

Transportation Conformity Adequacy Review

Revised Coachella Valley Particulate Matter Attainment Plan

Adopted June 21 and September 13, 2002, Submitted November 18, 2002

TRANSPORTATION REVIEW CRITERIA		IS CRITERI ON SATISFI ED?	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 November 18, 2002 transmittal letter submitting the plan was sent by ARB's Executive Officer, Michael P. Kenny, the governor's designee. Documentation accompanying the describes both state and local level public hearings.
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 an extensive public and agency outreach effort. EPA received copy of the plan and EPA's comments were addressed.
Sec. 93.118(e)(4)(ii)	The motor vehicle emission budgets are clearly identified and precisely quantified.	Y	The motor vehicle budgets are clearly identified and precisely quantified in Appendix E, Table E-3.

TRANSPORTATION REVIEW CRITERIA		IS CRITERI ON SATISFI ED?	REFERENCE IN SIP DOCUMENT/COMMENTS
Sec. 93.118(e)(4)(i v)	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 attainment in the Coachella Valley Area by 2006 and that the MVEBs are consistent with that demonstration.
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 emission inventory for 2006 for all point, area and mobile sources is described in Table 3-6 of the 2002 plan. The control strategy is set out in Chapter 5 of the plan Table 3-7 provides the emission reductions from the control strategy for PM-10.. Budgets are calculated as 2006 emission inventory minus reductions from control strategy.
Sec. 93.118(e)(4)(v i)	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).	Y	Budgets submitted in the 1996 PM Maintenance Plan were disapproved. See 64 FR 71136 (December 20, 1999). The reason for the disapproval was that different motor vehicle emissions elements were not combined into clearly defined budgets consistent with the federal conformity regulations. The budgets in the 2002 plan have been revised to include reentrained paved road dust, reentrant unpaved road dust and road construction.