



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 19 2017

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

Re: Adequacy Status of San Diego 8-Hour Ozone Reasonable Further Progress (RFP) Plan
Motor Vehicle Emissions Budgets

Dear Mr. Corey:

We have found adequate for transportation conformity purposes the motor vehicle emissions budgets (MVEBs or "budgets") in the *2008 Eight-Hour Ozone Attainment Plan for San Diego County (December 2016)*, ("2016 plan"), as these MVEBs pertain to the 2016 plan's reasonable further progress plan ("RFP plan"). As a result of our finding, San Diego Association of Governments (SANDAG) and the U.S. Department of Transportation must use the adequate budgets in future transportation conformity analyses once the finding becomes effective.

On April 12, 2017, the California Air Resources Board (CARB) submitted the 2016 plan to the Environmental Protection Agency (EPA) as a revision to the California State Implementation Plan (SIP). The 2016 plan includes new control measures and a demonstration of RFP for the 2008 8-hour ozone national ambient air quality standards (NAAQS). The 2016 plan identifies MVEBs for volatile organic compounds (VOC) and nitrogen oxides (NO_x) for the 2017 milestone year that applies to moderate areas for RFP. We announced availability of the RFP plan and related MVEBs on the Internet on July 20, 2017 and requested public comment by August 21, 2017. We received no comments on the budgets and RFP plan during that comment period.

This letter transmits our decision that the MVEBs for 2017 contained in the 2016 plan are adequate for transportation conformity decisions pertaining to the RFP plan. These budgets are consistent with the plan's RFP demonstration for milestone year 2017, 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 are as follows:

Adequate Motor Vehicle Emissions Budgets (Summer planning)		
Budget Year	Volatile Organic Compounds (tons per day)	Nitrogen Oxides (tons per day)
2017 and subsequent years	23	42

The budgets for 2017 and subsequent years meet the adequacy criteria found in 40 CFR 93.118(e)(4)(iii), (iv), and (v), as they relate to the RFP plan. Once effective, these budgets must be used for 2017 and subsequent years.

We have detailed our adequacy finding in the enclosure. A copy of this letter and its enclosure will soon be posted on the Internet at: <https://www.epa.gov/state-and-local-transportation/adequacy-review-state-implementation-plan-sip-submissions-conformity>. We will also announce the adequacy finding in the *Federal Register*. The finding will become effective 15 days after publication in the *Federal Register* pursuant to 40 CFR 93.118(f).

If you have any questions regarding this adequacy finding, please contact Doris Lo at (415) 972-3959 or John Kelly at (415) 947-4151.

Sincerely,



Matthew J. Lakin
Acting Director, Air Division

Enclosure

cc via email:

Robert Kard, Air Pollution Control Officer, San Diego Air Pollution Control District
Gary Gallegos, Executive Director, San Diego Association of Governments
Tashia Clemons, Federal Highway Administration
Adam Stephenson, Federal Transit Administration

Enclosure 1: Transportation Conformity Adequacy Review

<p>Control Strategy State Implementation Plan (SIP) Under Review: <i>2008 Eight-Hour Ozone Attainment Plan for San Diego County (December 2016)</i>, (“2016 plan”) Reasonable Further Progress plan portion (“RFP plan”) Reviewers: John Kelly</p>	<p>Date of SIP Revision Receipt by EPA: April 12, 2017</p>
<p>Sec. 93.118(e)(4)(i)</p>	<p>Date: 10/5/2017</p>
<p>Adequacy Review Criteria (40 CFR part 93)</p>	<p>Is Criterion Satisfied?</p>
<p>The plan was endorsed by the Governor (or designee) and was subject to a public hearing.</p>	<p align="center">Y</p>
<p>Reference in SIP Document/Comments</p>	<p>The April 12, 2017 transmittal letter submitting the <i>2008 Eight-Hour Ozone Attainment Plan for San Diego (December 2016)</i>, (“2016 plan”), to the EPA was sent by the California Air Resources Board’s (CARB) Executive Officer, Richard Corey, the Governor’s designee. The 2016 plan includes the RFP plan for the area.</p> <p>The transmittal letter indicates that CARB formally adopted the 2016 plan on March 23, 2017 through a Board Resolution (Resolution 17-6). The San Diego Air Pollution Control District (SDAPCD or “district”) discussed the draft plan at a public workshop held on September 8, 2016 and released a later version on November 14, 2016, holding a public hearing on the plan on December 14, 2016. Here is a link to the district’s notice: http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules and Regulations/Public Hearings/Ozone Attainment Plans/Public Notice-SIP.pdf.</p> <p>The district transmitted the 2016 plan to CARB. CARB issued public notice regarding the plan on February 17, 2017 and required that public comments not physically submitted at the CARB public hearing be received by the Clerk of the Board no later than 5:00 p.m., March 20, 2017. CARB held a public hearing on the 2016 plan on March 23, 2017. Here is a link to the CARB notice: https://www.arb.ca.gov/regact/nonreg/2017/sansip2017.pdf</p>

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	<p>Consultation with federal, state and local agencies was undertaken. The consultation process for conformity budgets occurs in San Diego via the San Diego Association of Governments (SANDAG), which hosts the San Diego Region Conformity Working Group (CWG). The CWG membership includes SANDAG, SDAPCD, Federal Highway Administration (FHWA), Federal Transit Authority (FTA), the U.S. Environmental Protection Agency (EPA), CARB, and the California Department of Transportation (Caltrans). The meetings are open to the public. Meeting notices are posted on the SANDAG website. Consultation on the draft plan, including the conformity budgets, occurred on November 2, 2016. The materials for that meeting can be found at the following link: http://www.sandag.org/index.asp?meetingID=4330&fuseaction=meetings.detail</p> <p>EPA received a copy of the draft plan and EPA's comments were addressed.</p> <p>The motor vehicle emissions budgets for 2017 are clearly identified and precisely quantified on page 8 of the plan.</p>
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	
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, attainment, or maintenance (whichever is relevant to the given plan).	Y	<p>EPA has preliminarily concluded that the budgets for the year 2017, when considered together with all other emission sources, are consistent with the requirement to demonstrate reasonable further progress for the 2008 8-hour ozone standard for a moderate nonattainment area. This finding is based on our preliminary review of the plan's ozone RFP demonstration (section 3.3 of the plan, specifically table 3-6, "RFP Demonstration – 2012 to 2017") that shows the required moderate area 15% reduction from the area's 2012 baseline, of volatile organic compounds (VOC) and/or nitrogen oxides (NOx), prior to the area's 2017 moderate RFP milestone.</p>

<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>Y</p>	<p>The 2016 plan shows a clear relationship among the budgets for year 2017, the control measures, the actual emissions inventory for the 2012 base year and the projected emissions inventory in the 2017 RFP milestone year. The planning emissions inventories for all stationary, area, on-road mobile, and nonroad mobile sources are presented in detailed tables in Attachment A to the 2016 plan and summarized in Figure 2-1. The MVEBs that are shown on page 8 of the 2016 plan, in Table 2-1, and that are documented in Appendix A, are consistent with the on-road emissions estimates in Figure 2-1. The 2016 plan conservatively loads projected increases in emissions from military activities in the nonattainment area (presented in Attachment B of the plan), into year 2017 for modeling purposes, although these increases are expected to occur out to year 2035. Likewise, the 2016 plan conservatively loads emissions increases that occur out to year 2040 from the San Diego International Airport into year 2017. The inventories (including the budgets) are then combined with pre-2012 emissions reduction credits (ERCs) shown in Appendix F to the 2016 plan, to provide the basis for demonstrating RFP in year 2017.</p>
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Sec. 93.118(e)(4)(vi)	<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>	Y	<p>The 2016 plan represents the first state implementation plan (SIP) submittal for the area under the national ambient air quality standards (NAAQS) for ozone, set by the EPA in 2008. However, for context, the RFP plan budgets submitted in the 2016 plan represent a new set of budgets that replace ones we previously found adequate or approved, including for use in transportation conformity for future years. Specifically, effective June 9, 2008, EPA found budgets for VOC and NOx (53 and 98 tons per day, respectively) to be adequate for transportation conformity purposes in the San Diego nonattainment area for the 1997 ozone NAAQS. See 73 FR 30098, May 23, 2008. The budgets found adequate in 2008 are still in effect and would otherwise remain so until 2020, when the first of two maintenance plan budgets are approved for transportation conformity purposes. However, beginning on the effective date of our adequacy finding regarding the 2017 RFP budgets (15 days after publication in the <i>Federal Register</i>), SANDAG and U.S. DOT must use the 2017 budgets for transportation conformity purposes. The budgets are 23 tons per day (tpd) VOC and 42 tpd NOx. We note that the area is already meeting the 2017 budgets. The SANDAG 2015 Regional Transportation Plan (RTP) shows transportation emissions in 2015 were 21 tpd VOC and 38 tpd NOx. See Table B.9 in the RTP's Appendix B, "Air Quality Planning and Transportation Conformity," found online here: http://www.sdforward.com/pdfs/RP_final/AppendixB-AirQualityPlanningandTransportationConformity.pdf</p>
Sec. 93.118(e)(5)	<p>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>	Y	<p>2017 RFP budgets also replace the budgets in our approval of the area's redesignation to attainment and maintenance plan for the 1997 ozone NAAQS—the 2020 budgets were 23 tpd VOC, 38 tpd NOx and the 2025 budgets were 21 tpd VOC and 30 tpd NOx. See 78 FR 33230, June 4, 2013.</p> <p>No public comments were received at the March 23, 2017 CARB hearing on the 2016 plan. See CARB's April 12, 2017 transmittal letter. At the district's September 8, 2016, public workshop on the draft plan, comments were received. The district responded to these comments. See Workshop Report. 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 were raised. Also, no comments were received on the 2016 plan at the district's December 14, 2016 public hearing.</p>