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Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.

Chairman

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Arnold Schwarzenegger
Governor

March 15, 2004

Mr. Charles L. Fryxell
Air Pollution Control Officer
Antelope Valley Air Quality
Management District
43301 Division St. Suite 206
Lancaster, California 93535-4649

Dear Mr. Fryxell:

Thank you for the opportunity to comment on the February 2004 Draft Antelope Valley Air Quality Management District (District) 2004 Ozone Attainment Plan (Draft Plan), which is intended to address both federal and State ozone planning requirements.

Federal Requirements

The Antelope Valley District portion of Los Angeles County, together with a portion of the Mojave Desert District (in San Bernardino County), and the Coachella Valley (in Riverside County), comprises the Southeast Desert nonattainment area for the federal one-hour ozone standard. Since each sub-area is under the jurisdiction of a separate air district, each district board must approve its element of a State Implementation Plan (SIP) revision and the combined plans must satisfy federal requirements for the nonattainment area as a whole. The existing 1994 SIP for the Southeast Desert needs to be updated to reflect substantial changes to the emission inventory and attainment strategy, including the local benefits of control measures adopted by the State and the South Coast Air Quality Management District.

A comprehensive SIP revision will establish new Southeast Desert transportation emission budgets that the Southern California Association of Governments (SCAG) needs to secure federal approval and funding for its 2004 Regional Transportation Plan by June 8, 2004. The District Board's action on April 20, 2004 is essential to ensuring a conformity finding for the entire SCAG region.

While the Draft Plan addresses many federal requirements, there is supplemental information that needs to be incorporated to secure Air Resources Board (ARB) approval and submittal to the U.S. Environmental Protection Agency (U.S. EPA) as a SIP revision. The attached comments detail staff's evaluation of the Draft Plan as it applies to federal requirements. The enclosures provide additional materials that

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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should be used to strengthen the Draft Plan. The South Coast District has also agreed to provide you with further information on the air quality modeling that is the basis for the 2007 ozone attainment demonstration for the Southeast Desert. These materials need to be made available to the public during its review of the Draft Plan. To facilitate this effort, we are concurrently transmitting these comments, including all attachments and enclosures, to your staff in electronic format. We are providing similar comments to the Mojave Desert District on its portion of the SIP revision.

Upon local adoption of approvable plans by the Mojave Desert and Antelope Valley District Boards and transmittal to ARB, we will: (1) combine them with the adopted plan for Coachella Valley, (2) approve the comprehensive revision to the Southeast Desert ozone SIP, and (3) forward the SIP to the U.S. EPA for approval, with a request to expedite its adequacy finding on the transportation conformity budgets.

State Requirements

The Draft Plan also seeks to satisfy the District's triennial obligation under the California Clean Air Act to show progress towards attainment of the State ozone standard. As our staffs have discussed, the current draft represents a first step, but additional analyses must be performed to fully comply with the requirements of State law. These include: (a) an accounting of emission reduction progress, (b) a demonstration that the district has reduced emissions of each ozone precursor by five percent per year or that "all feasible measures" have been adopted or scheduled for development, (c) an analysis of how new emissions growth will be offset, and (d) an assessment of air quality trends. ARB staff will work with District staff on a longer timeline to insure that the California Clean Air Act plan component addresses applicable State requirements.

If you have any questions, please call me at (916) 445-4383 or have your staff contact Ms. Lucille van Ommering, District Liaison, at (916) 323-0296.

Sincerely,

/s/

Catherine Witherspoon
Executive Officer

Attachment and Enclosures

cc: See next page.

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cc: Mr. Mark Pisano (Without Attachment/Enclosures)
Executive Director
Southern California Association
of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017

Dr. Barry Wallerstein (Without Attachment/Enclosures)
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South Coast Air Quality
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21865 Copley Drive
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Ms. Lynn Terry
Deputy Executive Officer
Air Resources Board

Ms. Lucille van Ommering
Air Resources Board

Attachment

Summary of Clarifications and Supplemental Information Needed to Strengthen the Federal Elements of the 2004 Antelope Valley Air Quality Management Plan

To comply with State Implementation Plan requirements, the Air Resources Board (ARB) staff has identified the following items that need to be addressed in the federal elements of the final 2004 Antelope Valley Air Quality Management Plan. We have consulted with U.S. Environmental Protection Agency (U.S. EPA) staff to ensure a consistent interpretation of federal requirements and to define critical improvements to the Draft Plan. This discussion references multiple enclosures that should be incorporated into the Plan, along with the modeling information being provided by the South Coast Air Quality Management District. The District needs to make these materials available to the public during its review of the Draft Plan; we have also posted them on ARB's website at: <http://arb.ca.gov/planning/sip/sedsip04/sedsip04.htm>.

A. Emission Inventory

- 1) In addition to a base year inventory for 2002, the final Plan should provide a comprehensive on-road mobile source emissions inventory forecast for reactive organic gases (ROG) and nitrogen oxides (NOx) for 1990, 2005, and 2007. Enclosure A provides this information for the Antelope Valley Air Quality Management District.
- 2) Federal requirements for ozone plans call for use of seasonal inventories representing emissions during a typical summer day. The mobile and area source emissions presented in the Draft Plan are correctly adjusted to reflect a typical ozone seasonal day (seasonal adjustment). However, stationary point sources for the base year and 2007 attainment year represent emissions as tons per "annual average day." Our analysis of the inventory for the entire District indicates that the difference between annual average and ozone seasonal day emissions for stationary and area sources combined may be less than one percent. The final Plan should provide a justification for the use of annual average day stationary and area source inventories and discuss the impact, if any, on the attainment demonstration.
- 3) The emissions inventory forecast in Appendix B of the Draft Plan contains a line item for New Source Review (NSR) Emissions Reduction Credits (ERCs) and a line item for NSR Growth Allowance. The District provides a brief explanation of these numbers in Chapter 2. The Plan should provide additional information and clarification as to how pre-2003 ERCs and allowances are accounted for in the inventory. The District should also indicate whether the NSR and credit banking program have been federally

approved. In addition, the final Plan should describe how 2005 and 2007 ERC and growth allowance estimates were derived, and the source of reductions that will be made available as credits. We understand that the growth allowance is limited to sources under the federally applicable NSR threshold of 25 tons per year – discussions with U.S. EPA indicate that such an approach would be consistent with federal policy. If this is correct, this limitation should be clearly stated in the final Plan, and included as a footnote in applicable point source emissions inventory tables.

B. District Control Strategy – Contingency Measures

- 1) The Plan should indicate that California's adopted motor vehicle emission reduction program will continue to reduce emissions in the Antelope Valley and upwind regions beyond 2007, and serves as a contingency measure for this Plan. Combined VOC and NOx emissions from on-road motor vehicles within the District are projected to decline by 2.4 tons per day, or 19.3 percent, from 2007 to 2010.

C. General Conformity

- 1) The Draft Plan identifies an emissions budget for federal operations at Air Force Plant 42 for use in general conformity analyses. The draft budgets show increasing emissions at the Base from 2002 through 2020. Emission budgets for federal facilities may be readily established for calendar years up to and including the attainment year. These budgets are based on the emission estimates for those facilities as reflected in the inventory used for the rate of progress and attainment demonstrations.

It is possible to identify budgets for post-attainment years, but this requires an additional showing that any increase in emissions from these facilities above attainment levels is fully balanced by a net decrease from all other sources beyond the levels needed for attainment. The inventory-based analysis should include all source categories for each year in which a budget is proposed and demonstrate that attainment emission levels are preserved. The District needs to make such a showing for the post-2007 general conformity budgets to be approvable under federal requirements.

D. Rate of Progress (ROP)

- 1) The final Plan must demonstrate ongoing emission reductions relative to 1990 within the federal ozone nonattainment area. Enclosure B summarizes how the combined plans for the Southeast Desert Modified AQMA demonstrate ROP for 2005 and 2007. Enclosure C provides the technical analysis supporting the ROP demonstration.

E. Attainment Demonstration

- 1) The Draft Plan relies upon a regional air quality modeling analysis performed by the South Coast Air Quality Management District. The South Coast District has agreed to provide you with further information on the air quality modeling that is the basis for the 2007 ozone attainment demonstration in the Southeast Desert.