April 13, 2004

Mr. Wayne Nastri  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105  

Dear Mr. Nastri:

The Air Resources Board (ARB) requests that the U.S. Environmental Protection Agency (U.S. EPA) initiate parallel processing of proposed revisions to the Southeast Desert Modified Air Quality Management Area (Southeast Desert) portion of the California State Implementation Plan (SIP) for the federal one-hour ozone standard. This revision updates the attainment and rate-of-progress demonstrations to reflect significant new information on emissions, statewide and upwind controls, and air quality modeling since the approved 1994 SIP.

This SIP revision also makes corresponding changes to the motor vehicle emission budgets used to determine whether transportation plans and programs are consistent with air quality goals. The Southern California Association of Governments is the Metropolitan Planning Organization for much of the southern part of the State, including the Southeast Desert Area. To avoid any delays in transportation funding for the region, U.S. EPA needs to find the conformity budgets adequate and the federal transportation agencies need to approve a new conformity determination before the existing conformity determination for the SCAG region expires on June 8, 2004.

Under parallel processing procedures, we request that upon receipt of this letter, U.S. EPA initiate the public comment period for the budget adequacy process via website posting on U.S. EPA's adequacy review website. We ask that you act to find the proposed conformity budgets adequate once the 30-day comment period is complete and the adopted SIP revision is formally submitted.
The Southeast Desert nonattainment area includes portions of three regions under the jurisdiction of separate local air agencies:

- A portion of Mojave Desert, in the Victor Valley/Barstow region in San Bernardino County under the Mojave Desert Air Quality Management District (Mojave Desert District). The sparsely populated, eastern portion of this District is outside the boundaries of the federal nonattainment area.
- Antelope Valley, in Los Angeles County under the Antelope Valley Air Quality Management District (Antelope Valley District).
- Coachella Valley, in Riverside County under the South Coast Air Quality Management District (South Coast District).

Each district board must approve its element of a SIP revision and the combined plans must satisfy federal requirements for the Southeast Desert nonattainment area as a whole. The South Coast District Board adopted its plan for Coachella Valley on August 1, 2003 and November 7, 2003. The Antelope Valley District Board will consider adoption of its plan at a public hearing on April 20, 2004; the Mojave Desert District Board will consider its plan on April 26, 2004.

Based on our review of the adopted Coachella plan and the revised draft Mojave and Antelope plans, the combined Southeast Desert ozone SIP revision will meet applicable federal requirements. The attainment demonstration modeling covered a domain of 80,000 square miles, including all of the Southeast Desert and its primary upwind transport contributor, the South Coast Air Basin. The modeling shows that the Southeast Desert will attain the one-hour ozone standard by 2007, based primarily on statewide and South Coast controls. The combined plans for the three Desert areas show sufficient ozone precursor reductions within the Southeast Desert boundaries to meet rate-of-progress requirements in 2005 and 2007. If each district adopts its plan as proposed, ARB is prepared to expedite its action to compile the three elements, approve the comprehensive SIP, and submit it to U.S. EPA with a request to expedite the adequacy finding on the transportation conformity budgets.

To ensure that any future updates to these budgets are used expeditiously in the conformity process, we also request that U.S. EPA allow budgets to be replaced upon a finding of adequacy. To accomplish this, we ask U.S. EPA to limit its approval of the budgets submitted today to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets.
Enclosures  This package consists of the following documents:

1. Mojave Desert
   - Revised Draft 2004 Mojave Desert District 2004 Ozone Attainment Plan, March 2004. Only those parts of the proposed Plan related to the federal SIP requirements and the federal ozone nonattainment area are included in this request.

2. Antelope Valley
   - Revised Draft 2004 Antelope Valley District 2004 Ozone Attainment Plan, March 2004. Only those parts of the proposed Plan related to the federal SIP requirements are included in this request.

3. Coachella Valley
   - December 9, 2003 letter from Mr. Zorik Pirveysian, South Coast District to Ms. Cynthia Marvin, ARB, transmitting 2005 and 2007 summer planning and annual average day emission inventories for the Coachella Valley.

      Note: We transmitted the Coachella ozone plan materials to U.S. EPA for informal review on January 9, 2004 and include them in this submittal by reference.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

/s/ LMT for CEW

Catherine Witherspoon
Executive Officer

Enclosures

cc:  See next page.
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cc: (Without Enclosures)

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