



Alan C. Lloyd, Ph.D.
Agency Secretary

Air Resources Board



Arnold Schwarzenegger
Governor

1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

December 27, 2005

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 the proposed *Sacramento Regional Nonattainment Area 8-Hour Ozone Rate-Of-Progress Plan* (Early Progress Plan) as a revision to the California State Implementation Plan (SIP). The Sacramento region 8-hour ozone nonattainment area, classified as serious, covers all or part of five local air districts: El Dorado County Air Quality Management District, Feather River Air Quality Management District, Placer County Air Pollution Control District, Sacramento Metropolitan Air Quality Management District, and Yolo-Solano Air Quality Management District.

The Early Progress Plan documents that, between 2002 and 2008, the Sacramento nonattainment area will achieve an 18 percent reduction in ozone precursor emissions. As allowed by the Clean Air Act and U.S. EPA guidance, the Early Progress Plan uses both nitrogen oxide (NOx) and volatile organic compound (VOC) emission reductions to demonstrate the 18 percent emissions reduction.

The Early Progress Plan contains emission reductions from adopted control measures that go beyond the region's current SIP. Consequently, it is the Sacramento region's first installment of emission reductions needed to attain the federal 8-hour ozone standard.

Restoring Federal Transportation Funding

The purpose for preparing the Early Progress Plan and requesting an expedited review is to set new budgets for transportation conformity for the Sacramento nonattainment area. The existing budgets are based on the 1994 Ozone SIP and a prior, outdated version of California's motor vehicle emission model (EMFAC). The proposed budgets in the Early Progress Plan are based on the current approved model, EMFAC2002.

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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The Sacramento Area Council of Governments (SACOG) is the Metropolitan Planning Organization for the Sacramento region. The SACOG region has been under a conformity lapse since October 4, 2004. Restoration of the region's transportation funding is dependent on U.S. EPA finding the conformity budgets in the Early Progress Plan adequate and the federal transportation agencies approving a new metropolitan transportation plan. The Early Progress Plan is a placeholder that will be replaced by a reasonable further progress (RFP) plan to be submitted as part of the Sacramento area's 2007 ozone SIP. The 2007 ozone SIP, which is due in June 2007, will include a demonstration of attainment, a 2007 RFP plan with milestones out to the attainment year, and new motor vehicle emission budgets based on EMFAC2007.

Because California will submit EMFAC2007-based motor vehicle emission budgets in the comprehensive 2007 ozone SIP, we request that U.S. EPA allow the proposed budgets in the Early Progress Plan to be replaced upon a finding of adequacy of the subsequent proposed budgets. To accomplish this, we ask U.S. EPA to limit its approval of the Early Progress Plan budgets to last only until the date of future U.S. EPA adequacy findings for replacement budgets. The approval ensures that motor vehicle emission budgets to which transportation plans must conform are based on the most recent data available.

Parallel Processing

To expedite 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 webpage. We ask that U.S. EPA act to find the proposed conformity budgets adequate once the 30-day comment period is complete and the adopted Early Progress Plan is formally submitted. The five air pollution control agencies within the nonattainment area will consider the Early Progress Plan at a series of public hearings, with the last scheduled for February 9, 2006. After receiving the Early Progress Plan from the local air districts, ARB is prepared to expedite its submittal to U.S. EPA.

Use of NOx Substitution

U.S. EPA ozone guidance and the Clean Air Act allow the use of NOx emission reductions to supplement VOC reductions for the 8-hour ROP if: (1) NOx emission reductions are effective in reducing ozone levels; and (2) the nonattainment area has met the mandatory 15 percent VOC emission reduction only requirement. First, preliminary 8-hour ozone attainment modeling indicates that NOx emission reductions are more effective than VOC emission reductions at reducing ozone at the high monitoring sites in the Sacramento region. Second, the Early Progress Plan contains an amendment to the Sacramento region's 1994 15 percent VOC rate of progress (ROP) plan prepared for the 1-hour ozone standard. The amendment documents that,

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between 1990 and 1996, the Sacramento nonattainment area achieved a 15 percent reduction of VOC emissions. Appropriately, the Early Progress Plan contains both NOx and VOC emission reductions to demonstrate progress towards attaining the 8-hour ozone standard.

Contents

Enclosed as part of this submittal are the following documents:

1. Proposed Sacramento Regional Nonattainment Area 8-Hour Rate-Of-Progress Plan Revision, December, 2005; and
2. Appendix D, Motor Vehicle Emissions Budget Documentation.

The Early Progress Plan can be found on the Sacramento Metropolitan Air Quality Management District's website at <http://www.airquality.org/cleanairplan/index.shtml>. In addition, the ARB website at <http://www.arb.ca.gov/planning/sip/sacrop05/sacrop05.htm> includes further details on the motor vehicle emissions inventory and transportation conformity budgets.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Mr. Gary Honcoop, Manager, Strategic Analysis and Liaison Section, at (916) 322-8474.

Sincerely,

/s/

Catherine Witherspoon
Executive Officer

Enclosures

cc: See next page.

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cc: (Without Enclosures)

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Mr. Larry Greene
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Ms. Deborah Jordan, Director
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cc: (continued)

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Mr. David A. Valler, Jr.
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Feather River Air Quality
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938 14th Street
Marysville, California 95901

Ms. Lynn Terry
Air Resources Board

Mr. Gary Honcoop
Air Resources Board