



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Post Office Box 2815
Sacramento, California 95812

Re: Adequacy Status of San Diego 2008 and 2015 Ozone Attainment Plan Motor Vehicle Emissions Budgets

Executive Officer Corey:

We have found adequate for transportation conformity purposes the motor vehicle emissions budgets (“budgets”) in the “2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020)” (“2020 plan” or “plan”), as these budgets pertain to the plan’s reasonable further progress (RFP) and attainment demonstrations. As a result of our finding, the San Diego Association of Governments (SANDAG) and the U.S. Department of Transportation (USDOT) must use the adequate budgets in future transportation conformity analyses once the finding becomes effective.

On January 12, 2021, the California Air Resources Board submitted the 2020 plan to the Environmental Protection Agency as a revision to the California State Implementation Plan. The plan includes new control measures and demonstrations of RFP and attainment for both the 2008 and 2015 ozone national ambient air quality standards (NAAQS). The plan identifies budgets for volatile organic compounds and nitrogen oxides for the milestone years that apply to Severe areas for RFP and for the attainment years for each of the two ozone NAAQS. We announced availability of the plan and related budgets on the Internet on June 4, 2021 and requested public comment by July 6, 2021. We received no comments on the budgets and plan during that comment period.

This letter transmits our decision that the budgets contained in the 2020 plan are adequate for transportation conformity decisions. These budgets are consistent with the plan’s RFP and attainment demonstrations for applicable milestone years, 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:

San Diego County Motor Vehicle Emissions Budgets for 2008 Ozone NAAQS		
Budget Year	Volatile Organic Compounds (tons per average summer day)	Nitrogen Oxides (tons per average summer day)
2020	16.3	28.1
2023	13.6	19.3
2026	12.1	17.3

San Diego County Motor Vehicle Emissions Budgets for 2015 Ozone NAAQS		
Budget Year	Volatile Organic Compounds (tons per average summer day)	Nitrogen Oxides (tons per average summer day)
2023	13.6	19.3
2026	12.1	17.3
2029	11.0	15.9
2032	10.0	15.1

For the 2008 ozone NAAQS, the budgets for 2020, 2023, and 2026 meet the adequacy criteria found in 40 CFR 93.118(e)(4)(iii), (iv), and (v). Once effective, these budgets must be used to demonstrate transportation conformity for the 2008 ozone NAAQS.

For the 2015 ozone NAAQS, the budgets for 2023, 2026, 2029, and 2032 meet the adequacy criteria found in 40 CFR 93.118(e)(4)(iii), (iv), and (v). Once effective, these budgets must be used to demonstrate transportation conformity for the 2015 ozone NAAQS.

Pursuant to 40 CFR 93.104(e), within 2 years of the effective date of the adequacy finding, SANDAG and the USDOT will need to demonstrate conformity to the new budgets if the demonstration has not already been made. For demonstrating conformity to the budgets in this plan, the motor vehicle emissions from implementation of the transportation plan should be projected consistently with the budgets in this plan, *i.e.*, by taking each pollutant's summer day emissions results from EMFAC and then rounding emissions up to the nearest tenth of a ton.

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 the date of publication in the *Federal Register* pursuant to 40 CFR 93.118(f).

If you have any questions regarding this adequacy finding, please contact Anita Lee at (415) 972-3958 or John Kelly at (415) 947-4151.

Sincerely,

Elizabeth J. Adams
Director
Air and Radiation Division

Enclosure

cc via email:

Mahiany Luther, Deputy Director, Compliance and Engineering Divisions, San Diego Air Pollution Control District

Domingo Vigil, Deputy Director, Environmental Justice, Monitoring and Technical Services and AB617, San Diego Air Pollution Control District

Paula Forbis, Senior Deputy County Counsel, San Diego Air Pollution Control District

Hasan Ikhata, Executive Director, San Diego Association of Governments

Tashia Clemons, Federal Highway Administration

Adam Stephenson, Federal Transit Administration

ENCLOSURE

Transportation Conformity Adequacy Review

Control Strategy State Implementation Plan (SIP) Under Review: "2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020)" ("2020 plan" or "plan")		Date of SIP Revision Receipt by EPA: January 12, 2021	
Reviewers: John Kelly		Date: 8/23/2021	
Adequacy Review Criteria (40 CFR part 93)		Is Criterion Satisfied?	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	<p>On January 12, 2021, the Governor's designee, California Air Resources Board's (CARB) Executive Officer, Richard Corey, submitted to the EPA the "2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020)" ("2020 plan" or "plan"), via the EPA's State Planning Electronic Collaboration System (SPeCS) for SIPs. The transmittal letter, dated January 8, 2021, indicates that CARB formally adopted the 2020 plan on November 19, 2020 through a Board Resolution (Resolution 20-29), following a CARB public hearing on November 19, 2020.</p> <p>The San Diego County Air Pollution Control District (SDCAPCD or "district") discussed the draft plan at two public webinars held in July 2020, and adopted the plan following a district public hearing on October 14, 2020. The following is a link to the district's public notice for the hearing: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/SIP%20Public%20Notice%20for%20Oct%2014%20wBlock.pdf</p> <p>The district transmitted the 2020 plan to CARB. CARB issued public notice regarding the plan on October 16, 2020 and required that public comments not physically submitted at the CARB public hearing be received by the Clerk of the Board no later than November 16, 2020. CARB held a public hearing on the 2020 plan on November 19, 2020. The following is a link to the CARB public notice: https://ww2.arb.ca.gov/sites/default/files/classic/regact/nonreg/2020/sd8hourozone2020.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	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, SDCAPCD, 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 July 1, 2020. The agenda for that meeting can be found at the following link: https://www.sandag.org/uploads/meetingid/meetingid_5455_27673.pdf The EPA received a copy of the draft plan and the EPA's comments were addressed.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	<p>The motor vehicle emissions budgets are presented in two sections of the plan. For the 2008 ozone national ambient air quality standards (NAAQS), Table 3-1 on page 36 of the plan has clearly identified and precisely quantified budgets for years 2020, 2023 and for the attainment year 2026. For the 2015 ozone NAAQS, Table 4-1 on page 56 of the plan has clearly identified and precisely quantified budgets for years 2023, 2026, 2029 and for the attainment year 2032.</p> <p>Budgets in the plan were derived from modeled projections of mobile source emissions from the plan's emissions inventory, found in the 2020 plan, Attachment A. Modeled emissions inventory methodology is described in the plan in Attachment L. Section 3.1.2 for 2008 ozone and section 4.1.2 for 2015 ozone explain how the budgets were quantified—namely, that the budgets represent on-road motor vehicle emission estimates made using the EPA-approved EMFAC2017 (<i>see</i> 84 FR 41717, August 15, 2019) emissions model with vehicle miles traveled (VMT) and speed distribution data from the 2019 Regional Transportation Improvement Program (RTIP) adopted by the SANDAG on October 25, 2019, rounded up to the nearest tenth of a ton. The budgets do not include new emission reductions attributed to general commitments made by CARB in the 2016 State Strategy for the State Implementation Plan (adopted by CARB in March 2017). Therefore, these budgets are clearly identified and precisely quantified.</p>
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	The EPA has preliminarily concluded that the budgets for years 2020, 2023 and for the attainment year 2026 and beyond, when considered together with all other emission sources, are consistent with the requirements to demonstrate reasonable further progress and attainment for the 2008 ozone NAAQS for a severe nonattainment area. The EPA has also preliminarily concluded that the budgets for years 2023, 2026, 2029 and for the attainment year 2032 and beyond, when considered together with all other emission sources, are consistent with the requirements to demonstrate reasonable further progress and attainment for the 2015 ozone NAAQS for a severe nonattainment area. This finding is based on our preliminary review of the plan's demonstrations for reasonable

			<p>further progress (RFP) and attainment. For the 2008 ozone NAAQS, see section 3.2.2 of the plan, specifically table 3-3, page 44, “RFP Demonstration, 2008 Ozone NAAQS”) that shows the required severe area percentage reductions from the area’s 2011 baseline year emissions of both volatile organic compounds (VOC) and/or nitrogen oxides (NOx), prior to the area’s 2017, 2020, 2023 severe RFP milestones and the severe area’s 2026 RFP/attainment milestone. For the 2015 ozone NAAQS, see section 4.2.2 of the plan, specifically table 4-5, page 76, “RFP Demonstration, 2015 Ozone NAAQS”) that shows the required severe area percentage reductions from the area’s 2017 baseline year emissions of VOC and/or NOx, prior to the area’s 2023, 2026, 2029 severe RFP milestones and the severe area’s 2032 RFP/attainment milestone.</p>
Sec. 93.118(e)(4)(v)	The plan shows a clear relationship among the emissions budget(s), control measures and the total emissions inventory.	Y	<p>For the 2008 ozone NAAQS, the 2020 plan shows a clear relationship among the budgets for years 2020, 2023 and 2026, the control measures, the actual emissions inventory for the 2011 base year and the projected emissions inventory in the 2020, 2023 and 2026 RFP milestone years. The planning emissions inventories for all stationary, area, on-road mobile, and nonroad mobile sources are presented in detailed tables in Attachment A-3 to the 2020 plan and summarized in Figure 3-1. The budgets that are shown in Table 3-1, on page 36 of the 2020 plan, and that are documented in Appendix A, are consistent with the on-road emissions estimates in Figure 3-1. These budgets reflect control measures that are already adopted and approved into the SIP.</p> <p>For the 2015 ozone NAAQS, the 2020 plan shows a clear relationship among the budgets for years 2023, 2026, 2029 and 2032, the control measures, the actual emissions inventory for the 2017 base year and the projected emissions inventory in the 2023, 2026, 2029 and 2032 RFP milestone years. The planning emissions inventories for all stationary, area, on-road mobile, and nonroad mobile sources are presented in detailed tables in Attachment A-3 to the 2020 plan and summarized in Figure 4-1. The budgets that are shown in Table 4-1, on page 56 of the 2020 plan, and that are documented in Appendix A, are consistent with the on-road emissions estimates in Figure 4-1.</p>
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	Y	<p>The current applicable ozone precursor budgets for the San Diego area are from the area’s “2008 Eight-Hour Ozone Attainment Plan for San Diego County (December 2016)” (“2016 plan”). These budgets were developed for the San Diego area as a moderate nonattainment area for the 2008 ozone NAAQS. EPA found the budgets adequate at 82 FR 54339 (November 17, 2017), effective December 4, 2017. The current applicable ozone budgets from the 2016 plan were developed using EMFAC2014 and relate to the RFP milestone year of 2017. The budgets from the 2020 San Diego plan are for the 2008 and 2015 ozone NAAQS and are based on updated transportation activity data from SANDAG’s 2019 Regional Transportation Plan and CARB’s updated on-road motor vehicle emissions model, EMFAC2017. The budgets in the 2020 plan also differ in that they were developed for different RFP milestone and attainment years corresponding to the area’s requested</p>

	any changes to emission factors or estimates of vehicle miles traveled).		status as a severe nonattainment area for both the 2008 and the 2015 ozone NAAQS. The budgets in the 2020 plan start at the RFP milestone year 2020 and are successively lowered through the subsequent RFP and attainment milestone years for the two NAAQS: 2023, 2026 (2008 severe ozone attainment year) for the 2008 NAAQS, and continuing for the 2015 NAAQS with 2029 and lastly 2032, the 2015 severe ozone attainment year.
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	<p>No public comments were received prior to or during the November 19, 2020 CARB hearing on the 2020 plan. <i>See</i> CARB’s January 8, 2021 transmittal letter. Also, no comments were received on the 2020 plan at the district’s October 14, 2020 public hearing. <i>See</i> “County of San Diego, Air Pollution Control Board, Wednesday, October 14, 2020, Minute Order No. 1.”</p> <p>Written comments were received at the district’s July and August 2020 public webinars on the draft 2020 plan. The district responded to these comments. <i>See</i> SDCAPCD Air Pollution Control Board agenda item memo, dated October 14, 2020, “Attachment D – Response to Comments Report,” available online through the San Diego County Clerk of the Board’s website at http://www.sandiegocounty.gov/content/sdc/cob/bosa.html. 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.</p>