



South Coast Air Quality Management District

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November 9, 2022

Hon. Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Re: Request to Reclassify Coachella Valley from “Severe-15” to “Extreme” Nonattainment for the 2008 8-Hour Ozone National Ambient Air Quality Standard and the Related SIP Elements Required to Update the Motor Vehicle Emissions Budgets

Dear Dr. Cliff:

On November 4, 2022, the South Coast Air Quality Management District (South Coast AQMD) Governing Board approved 1) the request to reclassify Coachella Valley from “severe-15” to “extreme” nonattainment for the 2008 8-hour ozone standard, and 2) selected State Implementation Plan (SIP) elements required to update Motor Vehicle Emissions Budgets (MVEB), which are baseline emissions inventory, Reasonable Further Progress (RFP) demonstration and the updated MVEB for “extreme” nonattainment of the 2008 8-hour ozone standard.

Transportation conformity is required by the federal Clean Air Act (CAA) to ensure that regional transportation plans, programs, and projects are consistent with, or conform to a SIP for meeting the National Ambient Air Quality Standard (NAAQS or standard). Under U.S. EPA’s transportation conformity regulation, Southern California Association of Governments (SCAG’s) transportation plans such as the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) must demonstrate that the emissions from the proposed plan or program do not exceed the MVEB. The Coachella Valley MVEB for the 2008 8-hour ozone standard was established in the 2016 AQMP and revised in the 2018 SIP Update, which was approved by U.S. EPA with an effective date of October 16, 2020.

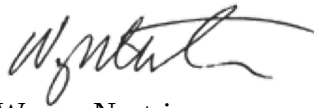
Conformity determinations for transportation plan amendments or new projects are required to employ the latest U.S. EPA approved on-road mobile source emissions model. That model is currently EMFAC2017. The MVEB contained in the approved 2008 8-hour ozone SIP was developed using EMFAC2014, which was the latest EPA approved model at the time of the plan adoption. EMFAC 2014 estimates lower emissions for the same vehicle classes and traffic activities. This leads to newly modeled vehicular emissions exceeding those in the approved MVEB in the Coachella Valley, resulting in a transportation conformity lockdown for the Coachella Valley. According to SCAG, there are \$26 billion worth of transportation projects currently being impacted by the conformity lockdown.

Under the CAA, states and local agencies can voluntarily request that U.S. EPA reclassify an area to the next nonattainment classification. South Coast AQMD is requesting to reclassify the 2008 8-hour ozone nonattainment status from “severe-15” to “extreme” with a new attainment date of July 20, 2032 for Coachella Valley. This enables the MVEB to be revised upon U.S. EPA’s granting of the request.

South Coast AQMD will continue developing a SIP to address the remaining “extreme” ozone nonattainment area requirements under CAA Section 182(e). This includes a SIP revision to demonstrate attainment by July 20, 2032. The Coachella Valley is already in “extreme” nonattainment for the 1997 8-hour ozone standard, and the South Coast AQMD is also planning to request reclassification to “extreme” nonattainment for the 2015 8-hour ozone standard. Therefore, no adverse impacts are expected from the change in classification for the 2008 8-hour ozone standard.

Via this letter, we are requesting CARB’s expeditious approval of the attached SIP package for submission to the U.S. EPA for inclusion in the SIP. If you have any questions or concerns, please contact me at 909-396-3131 or wnastri@aqmd.gov or Dr. Sarah Rees, Deputy Executive Officer of Planning, Rule Development & Implementation, at (909) 396-2856 or via email at SRees@aqmd.gov.

Sincerely,



Wayne Nastri
Executive Officer

WN:SN:SR:IM:BB:SL:EP:JHL

Attachments

1. Governing Board Package
2. Final Request to Reclassify Coachella Valley for the 2008 8-Hour Ozone Standard and the Related SIP Elements Required to Update the Motor Vehicle Emissions Budgets
3. Approved Governing Board Resolution
4. Proof of Publication for Notice of Public Hearing

Cc (email):

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