



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

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



Arnold Schwarzenegger
Governor

April 30, 2008

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 or Board) is pleased to submit proposed modifications to the transportation conformity budgets for the South Coast Air Basin, together with accompanying supplemental materials, to the U.S. Environmental Protection Agency (U.S. EPA) as a revision to the California State Implementation Plan (SIP). ARB approved these modifications as a revision to the SIP at a public hearing held April 24, 2008, and as a replacement for the budgets submitted on November 28, 2007. We request the U.S. EPA expedite its adequacy finding so that current budgets can be used to determine the conformity of the Southern California of Government's (SCAG) proposed 2008 Regional Transportation Plan (RTP) prior to the June 7, 2008 expiration of the existing RTP.

We understand that U.S. EPA is reluctant to approve the November 2007 budgets for the South Coast Air Basin because those budgets incorporate SIP emission reduction commitments that have not yet been solidified through adopted rules. However, budgets that reflect only already-adopted rules, the alternative recommended by U.S. EPA staff, would not provide the same level of environmental protection. In light of this, the Board has approved two sets of budgets for the Basin, and is hereby submitting them as proposed revisions to the SIP.

The budgets shown in Attachment 1 of the Board resolution reflect the emission reduction commitments made in the 2007 State Strategy and South Coast SIP revision. The budgets shown in Attachment 2 of the Board resolution reflect only the regulations adopted as of October 2006 (the baseline control program used to develop the 2007 SIP). We ask U.S. EPA to approve the more protective SIP-based budgets in Attachment 1, and consider the approval of the budgets in Attachment 2 only if the SIP-based budgets cannot be approved or found adequate in their entirety.

*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 South Coast Air District concurs with the action taken by ARB, as indicated by the District Board's April 4, 2008 approval of a Board letter describing the ARB staff proposal. On May 8, 2008, SCAG will consider adoption of its 2008 RTP. The Draft RTP, currently available for review and comment, includes conformity analyses comparing the proposed RTP's air pollution impacts to both the SIP-based and baseline conformity budgets.

To ensure that any future updates to these budgets are used expeditiously in the conformity process, we request that U.S. EPA allow replacement of these budgets upon an adequacy finding for budgets in future SIPs. 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.


This SIP submittal consists of the following enclosures:

- I. ARB Resolution 08-27, approved at a public hearing held April 24, 2008, adopting the proposed modifications to the transportation conformity budgets for the South Coast Air Basin.
- II. Completeness Checklist for the proposed modifications to the transportation conformity budgets for the South Coast Air Basin.
- III. Summary of comments received, and staff responses.
- IV. Five paper and two electronic copies of the revised budgets, with supplemental materials, including:
 - Board hearing publication notice.
 - Proof of Publication of the Board Hearing Notice in local newspapers.
 - Staff proposal posted on ARB's website.
 - April 4, 2008 SCAQMD Proposal: "Request to Modify 2007 AQMP Transportation Conformity Emission Budgets and Provide Alternative Approach in Response to U.S. EPA's Request," as approved by the SCAQMD Board.

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If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Mr. Kurt Karperos, Chief, Air Quality and Transportation Planning Branch, at (916) 322-0285.

Sincerely,



James N. Goldstene
Executive Officer

Enclosures

cc: (with Executive Order only)

Mr. Hasan Ikhata
Executive Director
Southern California Association
of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017-3435

Ms. Deborah Jordan, Director
Air Division, Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dr. Barry Wallerstein, Executive Officer
South Coast Air Quality
Management District
21865 E. Copley Drive
Diamond Bar, California 91765-4182

Ms. Lynn Terry
Deputy Executive Officer
Air Resources Board

Mr. Kurt Karperos
Air Resources Board