

February 22, 2023

Martha Guzman  
Regional Administrator  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, California 94105  
[guzman.martha@epa.gov](mailto:guzman.martha@epa.gov)

Dear Administrator Guzman:

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the South Coast Air Quality Management District (District) *2022 Air Quality Management Plan (2022 AQMP)* and portions of the relevant CARB Staff Report. These documents are submitted as a revision to the California State Implementation Plan (SIP) for the South Coast Air Basin (South Coast) and Coachella Valley to meet federal Clean Air Act (Act) requirements for the 70 parts per billion (ppb) 8-hour ozone standard. As detailed in the 2022 AQMP, the State also requests that the Coachella Valley be classified as Extreme for the 70 ppb 8-hour ozone standard.

The District adopted the 2022 AQMP on December 2, 2022. On January 26, 2023, CARB adopted the 2022 AQMP and the State aggregate emissions reduction commitment, reasonable further progress demonstrations, and Coachella Valley vehicle miles travelled offset demonstration contained in the CARB Staff Report. Together, these documents address 70 ppb 8-hour ozone standard requirements for the South Coast and Coachella Valley.

While awaiting new U.S. EPA written contingency measure guidance, CARB and the District continue to explore potential contingency measures and will comply with the contingency requirement based on the updated guidance. CARB commits to submit contingency measure rules or regulations for reasonable further progress to U.S. EPA within twelve months of the effective date of final conditional approval action for the 70 ppb 8-hour ozone standard. For attainment contingency, as allowed under section 182(e)(5) of the Act for Extreme areas, such measures are not due until at least three years prior to the 70 ppb 8-hour ozone standard Extreme area attainment date and will be submitted in conjunction with advanced technology contingency measures if advanced technology measures do not achieve planned reductions as required under section 182(e)(5) of the Act.

In addition to the State aggregate emissions reduction commitments in the CARB Staff Report, this submittal includes the commitment to pursue the specific measures adopted by CARB on September 22, 2022, that will achieve the State aggregate emissions reduction commitment. These measures were included in the *2022 State Strategy for the State Implementation Plan*.

This SIP submittal package consists of the following documents:

- 1) CARB 2022 *State Strategy for the State Implementation Plan* and supporting documentation, including:
  - a. CARB Resolution 22-14;
  - b. Public Notice for the September 22, 2022 CARB hearing;
  - c. Transcriptions of the September 22, 2022 CARB hearing; and
  - d. Public Comments on Proposed 2022 State Strategy for the State Implementation Plan with CARB Staff Responses Written Comments;
- 2) District 2022 AQMP submittal package, including:
  - a. December 13, 2022, letter from Mr. Wayne Natri, District Executive Officer, to Dr. Steven Cliff, CARB Executive Officer;
  - b. Governing Board resolution 22-39 adopting the 2022 AQMP on December 2, 2022;
  - c. Final 2022 AQMP including Appendices I through VII;
  - d. District Response to comments on the 2022 AQMP;
  - e. District Minutes from December 2, 2022, Board Hearings; and
  - f. District Proof of Publication for the 12/2/2022 public hearing;
- 3) CARB Staff Report, *CARB Review of the 2022 Air Quality Management Plan for the 70 parts per billion 8-hour Ozone Standard in the South Coast Air Basin and Coachella Valley*;
- 4) CARB Resolution 23-4.
- 5) Public notice for the January 26, 2023 CARB hearing;
- 6) Transcriptions of the January 26, 2023 CARB hearing;
- 7) Written Comments regarding the 2022 AQMP received by CARB; and
- 8) 2022 AQMP – SIP Completeness Checklist.

The 2022 AQMP on-road motor vehicle emission budgets use the EMFAC2017 model. To ensure that any future updates to these budgets are used expeditiously in the conformity process, we 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. We anticipate updating the budget using the latest approved EMFAC2021 model in the second quarter of 2024.

Without the ability to replace the applicable emission budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA's willingness to work with us in our efforts to utilize motor vehicle emission budgets based on the most-up-to-date, accurate data as soon as possible upon availability.

CARB is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have any questions, please contact Edie Chang, Deputy Executive Officer, at (916) 445-4383, or have your staff contact Michael Benjamin, Chief, Air Quality Planning and Science Division, at (916) 201-8968.

Sincerely,



Steven S. Cliff, Ph.D., Executive Officer

Enclosures (8)

cc: (with CARB Board Resolution 22-14 and 23-4 only)

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