



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

November 30, 2001

Mr. Wayne Nastri
Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Nastri:

The Air Resources Board (ARB or Board) hereby submits to the U.S. Environmental Protection Agency (U.S. EPA) five copies (enclosed) of the San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard, September 2001 (2001 Plan) as a proposed revision to the California State Implementation Plan (SIP). The three Bay Area co-lead agencies—the Bay Area Air Quality Management District (District), Metropolitan Transportation Commission (MTC), and the Association of Bay Area Governments (ABAG)—adopted the 2001 Plan on October 24, 2001 and transmitted it to ARB on October 31, 2001 for approval and submittal to U.S. EPA.

In compliance with the requirements set forth in the September 20, 2001 *Federal Register* (66 Federal Register 48340), the 2001 Plan contains an updated emissions inventory, revised attainment assessment, amended reasonably available control measures (RACM) analysis, strengthened control strategy, and new transportation conformity budgets. The 2001 Plan commits to reduce ozone precursor emissions by a total of 271 tons per day between 2001 and 2006.

The 2001 Plan also contains a commitment to complete a mid-course review of the SIP by December 15, 2003 using more advanced photochemical air quality modeling based on data gathered during the Central California Ozone Study. The mid-course review will use EMFAC 2001 or its successor to estimate motor vehicle emissions for the Bay Area. The three co-lead agencies commit to adopt by March 2004 a revised SIP that identifies the control measures necessary to attain the federal one-hour ozone standard. Furthermore, ARB commits to submit to U.S. EPA by April 15, 2004 the revised SIP, which will include revised motor vehicle emission budgets for the Bay Area based on EMFAC 2001 or its successor. ARB does not plan to submit to U.S. EPA any area's motor vehicle emission budgets based on EMFAC 2001 or its successor prior to January 2003. The 2001 Plan also includes 11 further study measures that will be evaluated by the respective co-lead agencies by December 2003 to identify additional potential technologically and economically feasible emission reductions.

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

SIP Submittal Materials

This submittal consists of the following materials:

- I) October 31, 2001 letter from Ms. Ellen Garvey, District Executive Officer to Mr. Michael P. Kenny, ARB Executive Officer, transmitting:
 - A) 2001 Plan,
 - B) Notice of Hearing with proof of publication,
 - C) Staff Report with summaries of comments and responses,
 - D) Comment letters,
 - E) Resolutions adopting the 2001 Plan from: the District Governing Board (Resolution 01-14), MTC Governing Board (Resolution 3419), and ABAG Governing Board (Resolution 16-01); also District Governing Board Resolution 01-13 adopting the California Environmental Quality Act Draft Negative Declaration prepared for the 2001 Plan, and
 - F) Final Negative Declaration for the 2001 Plan.
- II) Notice for ARB November 1, 2001 hearing to consider approval of the San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard, September 2001.
- III) ARB Resolution 01-27.
- IV) Written comments received by ARB on the 2001 Plan.
- V) SIP Completeness Checklist.

We are submitting to U.S. EPA under separate cover the San Francisco Bay Area-EMFAC-2000 emission factor model, for approval to use in the Bay Area only, to assess transportation conformity against emission budgets created with the 2001 Plan. ARB believes that together these materials constitute a complete SIP submittal and meet all applicable Clean Air Act requirements and the specific requirements identified by U.S. EPA.

We acknowledge that community groups continue to have concerns about air quality issues in the Bay Area. Therefore, we commit to work cooperatively with U.S. EPA and the three Bay Area co-lead agencies to improve outreach programs and to facilitate efforts to more fully involve stakeholders in the Bay Area air quality planning process. We also commit to participate fully in the evaluation of the further study measures identified in the 2001 Plan that involve reviews of potential emission reduction opportunities at refineries and other source categories.

We would also like to address an issue raised in a letter that was recently sent to you by Mr. Marc Chytilo, an attorney representing the Transportation Solutions Defense and

Education Fund. In his letter dated November 21, 2001, Mr. Chytilo states his belief (on page 2) that the Board adopted amendments to the 2001 Plan at the Board's November 1, 2001 public hearing. We would like to clarify that this statement is not correct. ARB did not amend or revise the 2001 Plan adopted by the District, ABAG, and MTC on October 24, 2001. At ARB's November 1, 2001 hearing, the Board adopted Resolution 01-27, which approved the Plan as adopted by the District, ABAG, and MTC, with no changes. Confusion seems to have arisen because at the hearing the Board did approve amendments to Resolution 01-27 (as proposed by ARB staff and then presented at the November 1, 2001 hearing for the Board's consideration). In these amendments, the Board directed the ARB Executive Officer to do certain things. The Board also urged the District to complete its evaluation of the refinery further study measures earlier than the Plan requires. These Board directions can be found on pages 9 and 10 of the enclosed final Resolution 01-27, as modified by the Board. Mr. Chytilo apparently believes that these Board directions are actual amendments to the Plan, which they are not. Accordingly, the text of the 2001 Plan being submitted by ARB as a SIP revision is identical to the 2001 Plan adopted by the District, ABAG, and MTC on October 24, 2001.

In light of the current transportation conformity freeze in the Bay Area, we urge that U.S. EPA act expeditiously in approving the motor vehicle emission budgets used for transportation conformity.

If you have questions regarding this submittal, you may contact me at (916) 445-4383, or have your staff contact Ms. Cynthia Marvin, Chief of the Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

/s/

Michael P. Kenny
Executive Officer

Enclosures