

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 San Joaquin Valley Air Pollution Control (District) *2022 Plan for the 2015 8-Hour Ozone Standard (2022 Ozone Plan)* and the State aggregate emissions reduction commitment specified in the CARB Staff Report. These documents demonstrate that California meets the Clean Air Act (Act) requirements for the 70 parts per billion (ppb) 8-hour ozone standard in the San Joaquin Valley Air Basin (San Joaquin Valley or Valley) and are being submitted as a revision to the California State Implementation Plan (SIP).

The District adopted the 2022 Ozone Plan on December 15, 2022. CARB adopted the 2022 Ozone Plan and the State aggregate emissions reduction commitment specified in the CARB Staff Report on January 26, 2023. Together, these documents address the 70 ppb 8-hour ozone standard requirements of the Act for the San Joaquin 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 submitting contingency measure rules or regulations for reasonable further progress and attainment to U.S. EPA within twelve months of the effective date of applicable final conditional approval for the 70 ppb 8-hour ozone standard.

This package consists of the following documents:

- 1) 2022 Ozone Plan;
- 2) District 2022 Ozone Plan submittal package, including:
  - a. District letter submitting the 2022 Ozone Plan to CARB;
  - b. District Resolution 22-12-13;
  - c. District Governing Board packet;
  - d. District Notice of Public Hearing; and
  - e. District SIP Completeness Checklist for submittal to CARB;
- 3) *CARB Review of the San Joaquin Valley 2022 Plan for the 70 ppb 8-Hour Ozone Standard* that includes the State aggregate emissions reduction commitment;
- 4) CARB Resolution 23-3;

- 5) Public notice for the January 26, 2023, CARB hearing;
- 6) Transcription of the January 26, 2023, CARB hearing;
- 7) Written comments regarding the 2022 Ozone Plan received by CARB; and
- 8) CARB SIP Completeness Checklist.

The 2022 Ozone Plan includes on-road motor vehicle emission budgets using 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)