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Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Arnold Schwarzenegger
Governor

November 8, 2004

Mr. Wayne Nastri
Regional Administrator
U.S. Environmental Protection Agency
Region 9
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) for approval, the *2004 Revision to the California State Implementation Plan for Carbon Monoxide* (2004 Plan Update). This revision consists of an update to the carbon monoxide (CO) maintenance plan for ten urban areas that have attained the federal air quality standard for CO since the early 1990s. The 2004 Plan Update shows how the ten areas will continue to maintain the CO standard through 2018. It updates emissions estimates and establishes new on-road motor vehicle emission budgets for transportation conformity purposes.

To ensure that any future updates to these budgets can be 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.

Background: In 1991, U.S. EPA designated eleven areas in California as nonattainment of the federal 8-hour CO standard. By 1995, ambient CO concentrations in ten areas met the air quality test for attainment, collectively referred to as the CO maintenance areas: Bakersfield, Chico, Fresno, North Lake Tahoe, South Lake Tahoe, Modesto, Sacramento, San Diego, San Francisco Bay Area, and Stockton.

In 1996, ARB adopted and submitted a CO Maintenance Plan (1996 Plan) for the ten areas listed above and requested that they be redesignated to attainment for the federal 8-hour CO standard. U.S. EPA found that the State satisfied the five criteria in the Clean Air Act for redesignation to attainment based on the 1996 Plan and prior SIP submittals for other elements. U.S. EPA approved the 1996 Plan as part of the California SIP, and redesignated the ten areas effective June 1, 1998.

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 1996 Plan showed how each area would continue to attain the standard through 2010. The Clean Air Act requires the initial maintenance plan to cover at least a ten-year period, with a second SIP revision due within eight years of redesignation to demonstrate that the area will maintain the standard for another ten years (i.e., a full 20 years from the date of redesignation to attainment, or 2018 in this case).

The 2004 Plan Update supercedes the 1996 revisions and complies with Clean Air Act requirements in section 175A for maintenance plans by including:

- Air quality data that demonstrate the ten areas continue to attain.
- Emissions forecasts that demonstrate the ten areas will remain in attainment for the full 20-year period through 2018.
- Contingency emission reductions from adopted ARB measures that generate progressively more benefits over time, effectively decreasing CO emissions during the remainder of the maintenance period well below the levels that resulted in attainment.
- Continued air monitoring to verify the attainment status of the redesignated areas.

Enclosures: This package consists of five copies of the following documents:

1. *2004 Revision to the California SIP for Carbon Monoxide: Updated Maintenance Plan for Ten Federal Planning Areas (July 2004).*
2. ARB Board Resolution 04-20 adopting the 2004 Plan Update.
3. Proof of Publication for Notice of Public Hearing.
4. Written comments on the 2004 Plan Update.
5. SIP Completeness Checklist.
6. Transcript of July 22, 2004 Board hearing.

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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 Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

/s/

Catherine Witherspoon
Executive Officer

Enclosures

cc: See next page.

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cc: (continued)

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