



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
www.sandag.org

November 29, 2011

File Number 3100600

TO: San Diego Region Conformity Working Group
FROM: Andrea Hoff, Regional Planner
SUBJECT: Cancellation of the December 7, 2011, Conformity Working Group Meeting

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS

Imperial County
California Department
of Transportation
Metropolitan
Transit System
North County
Transit District
United States
Department of Defense
San Diego
United Port District
San Diego County
Water Authority
Southern California
Tribal Chairmen's Association
Mexico

The San Diego Region Conformity Working Group (CWG) meeting, originally scheduled for Wednesday, December 7, 2011, has been cancelled. The next scheduled meeting date is Wednesday, January 4, 2012, at 10:30 a.m.

The meeting summary of November 2, 2011, is attached for your information.

If you have questions or a specific issue or topic that you would like to discuss at a future meeting, don't hesitate to contact me at (619) 699-1983 or via e-mail at e-mail at ahof@sandag.org. Thank you.

AHOF/dda

Attachment: Meeting Summary of November 2, 2011

San Diego Association of Governments
SAN DIEGO CONFORMITY WORKING GROUP

November 29, 2011

Action Requested: INFORMATION

MEETING SUMMARY OF NOVEMBER 2, 2011

File Number 3100600

Item #1: Introductions

Self-introductions were made. See attached attendance list.

Item #2: Summary of August 3, 2011, Meeting

Andrea Hoff, SANDAG, asked the Conformity Working Group (CWG) to review the meeting summary. No corrections were made.

Item #3: Public Comments/Communications

No public comments were made.

Item #4: 2050 Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) Amendment No. 13 Adoption Update

On October 28, 2011, the SANDAG Board of Directors made a conformity determination for the 2050 RTP and 2010 RTIP, as amended, and adopted the 2050 RTP and approved the 2010 RTIP Amendment No. 13. Elisa Arias, SANDAG, provided an update on these actions for the CWG.

Ms. Arias said that the conformity procedures were different for the 2050 RTP because the Plan's horizon year (2050) goes beyond the horizon year for the EMFAC 2007 software (2040). As a result, SANDAG was only able to determine conformity up to the year 2040, and staff had to follow a consultation process with a methodology that complies with the Conformity Rule to shorten the timeframe for the conformity finding. This also is the first RTP that includes a Sustainable Communities Strategy (SCS) to comply with Senate Bill 375; therefore, the 2050 RTP included analysis of greenhouse gases, which had not been done in the past.

Ms. Arias said that SANDAG has submitted the RTP, the signed resolutions, and the conformity check list to Caltrans, the Federal Highway Administration's (FHWA) Division Office in Sacramento, the U.S. Environmental Protection Agency's (EPA) Regional Office in San Francisco, as well as the Federal Transit Administration's (FTA) Regional Office in San Francisco requesting the conformity finding from the U.S. Department of Transportation. The conformity finding for the 2030 RTP expires December 10, 2011. SANDAG will be following up with these agencies to obtain the determination for the 2050 RTP prior to December 10, 2011.

Item #5: Implementation of the Ozone National Ambient Air Quality (NAAQ) Standard

Ms. Hoff directed the CWG to the memo from U.S. EPA's Assistant Administrator regarding the implementation of the ozone NAAQS dated September 22, 2011.

Carl Selnick, San Diego County Air Pollution Control District (APCD), provided information regarding the memo. Mr. Selnick said that the 2008 standard of .075 ppm is being implemented and that the designations for that standard are moving along on an accelerated schedule. Because states actually submitted recommendations for non-attainment areas for that standard in 2009, EPA is using those recommendations and the 2008-2010 air quality data, unless an area requests that the 2009-2011 air quality data be used instead. San Diego is requesting to use the 2009-2011 air quality data.

Ms. Arias asked if the request is made by APCD to CARB or to EPA. Mr. Selnick said he believed CARB made the request to EPA. He added that California had a clean year in 2011 and EPA is only expecting a limited number of areas to request the 2011 data to be considered. Also, in order for the 2011 data to be considered, APCD has to complete the quality assurance and certification on the data quickly. The data usually is certified in May in order for it to be considered for the designation process. However, APCD must have it certified by the end of February. Mr. Selnick said that APCD is prepared to do that and they are working on it.

Mr. Selnick said that EPA will take the recommendations that they have in hand and that they will consider the air quality data that came in since those recommendations were made and make adjustments based on the most recent air quality data. EPA will likely issue their proposed designations before the end of 2011; EPA will send out "120-day letters" with the proposed designations, and provide the air districts with four months to discuss with EPA regarding the designations and proposals. EPA intends to finalize the designations in the April-May timeframe. EPA will have to put out an implementation rule, which will come in two phases. EPA will probably propose the first phase at the same as the proposed designations. The first phase will include their proposed classification scheme. EPA intends to have the same classification scheme as the current eight-hour ozone standard but proportionally adjust the classification cut point to the change in the standard from .084 ppm to .075 ppm. EPA also will come out with a proposal that indicates when the State Implementation Plans (SIPs) will be due and what the requirements are. The second implementation rule will probably be proposed at the same time that they make the designations final by the end of 2012. Mr. Selnick clarified that all these dates are included in the memo.

Ms. Arias asked what the classification for San Diego would be based on the 2009-2011 data. Mr. Selnick said that when the 2009-2011 data is considered, San Diego would qualify for a marginal classification, assuming EPA makes that classification scheme final. Most areas in the country would be classified as marginal; there would just be certain number of other areas that would have higher classifications. If an area is classified as marginal, there is no SIP due immediately for that area. In that case, San Diego would have until 2015 to attain if the 2013, 2014, and 2015 air quality is clean. Otherwise, EPA would classify San Diego as moderate, and it would give it a schedule for completing a SIP thereafter. Mr. Selnick also said that he needed to investigate further to determine what would happen with the emissions budgets if there were no SIP due. If San Diego attains in 2015, APCD would have to create another maintenance plan, which would create another 2015 maintenance emissions budget that would supersede the 2011 maintenance emissions budget.

Item #6: Eight-Hour Ozone Standard Reclassification Update

Mr. Selnick said that the federal rulemaking to reclassify San Diego as serious for the 1997 eight-hour ozone standard of .084 ppm was expected to take place between November and December 2011. A new maintenance plan and redesignation request will soon be prepared by APCD. It is possible that San Diego could still be classified as a serious area and then be redesignated to attainment. The next conformity emissions budget will be the 2011 maintenance

emissions level because San Diego did attain. Mr Selnick will be working closely with SANDAG staff and the CWG as a whole to develop the maintenance plan and the maintenance emissions budgets.

Ms. Arias asked what would happen if the rulemaking for reclassifying San Diego as serious non-attainment did not happen by December.

Mr. Selnick responded that APCD would be preparing the redesignation request either way, so the next conformity emissions budget will be 2011.

Ms. Arias asked Mr. Selnick if he had a sense of when the draft EMFAC 2011 emissions factors would be finalized for the maintenance budgets. Mike Brady, Caltrans, also asked Mr. Selnick whether APCD would use EMFAC 2007 or 2011 for the maintenance budgets. Mr. Selnick said that APCD would use EMFAC 2011 for the maintenance budgets and asked the CWG if anyone had any concerns with APCD using EMFAC 2011 to come up with the new budgets. Ms. Arias said that using EMFAC 2011 was probably the best way to go because SANDAG's next conformity finding, whether it is for the RTIP or the RTP, will have to be done using EMFAC 2011 so for consistency purposes SANDAG would want the budgets done with the same software. Mr. Selnick added that for the 2002 maintenance plan APCD obtained the emissions budgets that SANDAG created using EMFAC, rather than using what is pre-packaged into the EMFAC program. Ms. Arias agreed since SANDAG has more detail in the network and a more updated network than what the California Air Resources Board (CARB) received from SANDAG when they developed EMFAC 2011. Mr. Selnick added that coordination between APCD and SANDAG will take place this winter to complete this task. Ms. Arias asked Mr. Selnick if he could share with SANDAG an outline of APCD's schedule in order to line up the necessary resources to help APCD start their redesignation request process.

Mr. Brady asked Ms. Arias if the fact that EMFAC 2011 only goes to 2035 instead of 2040 would cause any issues. Ms. Arias said that it was not certain and that it would be something that would have to be brought up for consultation in order to decide if SANDAG would have to further reduce the conformity time frame, or whether the 2035 emission factors can be used to estimate conformity through 2040.

Item #7: Other Business

Mr. Brady said that the planning assumptions approval for EMFAC 2007 expires in the middle of 2012 because it becomes five years old. He said he thought that this schedule will be driving adoptions of EMFAC 2011 rather than EPA's transition period. However, this would have to be confirmed by FHWA.

Ms. Arias asked if Mr. Brady attended a meeting in late October covering this issue. Mr. Brady said that he was peripherally involved in this meeting and that this issue was brought up during the meeting but it was not discussed. He wanted the CWG to be aware that the issue exists. Ms. Hoff said that it will be brought up in the next CWG meeting.

Item #8: Next meeting

Ms. Hoff stated that the next meeting of the CWG is scheduled for Wednesday, December 7, 2011, from 10:30 a.m.-12 noon at SANDAG. Meeting materials will be sent to the group in advance.

Attachment: Meeting Attendance from November 2, 2011

San Diego Region Conformity Working Group

Meeting Attendance

November 2, 2011

Name	Agency
Mike Brady (phone)	Caltrans
Jose Marquez (phone)	Caltrans District 11
Paul Swearingen	Caltrans District 11
Andrea Hoff	SANDAG
Elisa Arias	SANDAG
Domingo Vigil	SANDAG
Carl Selnick (phone)	SDAPCD
Naima Suieman	Public