

March 25, 2004

Ms. Margo T. Oge, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
Mail Code 6401 A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: U.S.EPA proposed amendments to the transportation conformity regulation to address eight-hour ozone and fine particulate matter standards

The Sacramento Federal Nonattainment Area (SFNA)¹ is mounting a regional effort to achieve federal health-based air quality goals. This cooperative effort includes the Sacramento, Placer, Yolo-Solano, El Dorado and Feather River Air Districts, as well as the Sacramento Area Council of Governments, the metropolitan planning organization for the region.

Our cooperative effort is aimed at ensuring that transportation conformity is maintained while progress continues toward AQ goals. Approximately 90% of ozone-forming NO_x in the SFNA comes from on and off road mobile sources. Therefore, the region has focused on reducing on-road mobile source NO_x. This effort has been effective and the region has made significant progress in improving air quality.

As EPA implements the transition from the current one-hour to the new eight-hour ozone standard, this region supports the goal expressed by the California Air Resources Board: "... to ensure that the transportation system contributes to the air quality solution – without creating procedural obstacles that delay transportation improvements."²

Specifically, the region supports the California Air Resources Board's request that U.S.EPA include an approach in its conformity regulation that allows our region to expedite the transition to new budgets based on an eight-hour control strategy SIP revision, such as a rate of progress plan, submitted earlier than required, including prior to the effective date for planned revocation of the one-hour standard. We request that the rule explicitly state that adequate 8-hour rate-of-progress budgets can supersede approved one-hour attainment demonstration budgets at any time.

¹ The SFNA includes all of Sacramento and Yolo Counties and parts of El Dorado, Placer, Solano and Sutter Counties

² December 22, 2003 letter from Catherine Witherspoon, Executive Officer, California Air Resources Board to Ms. Margo T. Oge, Director, Office of Transportation and Air Quality, U.S. Environmental Protection Agency

Our region remains committed to continued air quality improvement using all available resources to achieve emission reductions. U.S. EPA's inclusion of this option will allow us to direct increasingly scarce resources toward proven programs, and to develop additional strategies that will be needed as we take on the difficult job of meeting the more stringent, and health-protective, eight-hour standard, rather than waste resources on a defunct one-hour budget.

Please do not hesitate to contact me if you have any questions regarding our region's air quality.

Sincerely,

Illa Collin
Chair, Board of Directors
Sacramento Metropolitan Air Quality Management District

cc: Air Districts of the SFNA
Catherine Witherspoon, Executive Officer, California Air Resources Board
Martin Tuttle, Executive Director, Sacramento Area Council of Governments