

## Statewide Conformity Working Group

### November 15, 2021 Meeting Notes

1. US EPA Updates (Karina O'Connor)
  - Staff Updates:
    - Karina O'Connor, Panah Stauffer, and John Kelly remain the three points of contact for conformity work.
    - Panah is back from her temporary assignment and has returned to the Bay Area region as the conformity point of contact.
  - Regulatory Updates & SIP Actions:
    - Karina emailed Caltrans the latest version of NAAQS table. If there are any questions, please reach out to Karina or John Kelly.
    - CARB submitted EMFAC2021 to US EPA in August 2021.
      - EPA will act on the submittal once all mobile source measures included in EMFAC2021 are submitted to EPA for waivers.
      - Expecting Low NOx Omnibus measure waiver submittal by the end of 2021 and hoping for full EMFAC2021 review and approval early 2022.
    - EPA is leaning towards prioritizing action on EMFAC2021 rather than submitted EMFAC2017 adjustment factors.
      - Setting future meetings with Caltrans, CARB, and FHWA to talk about the length of the grace period for EMFAC2021 before the model can be approved. This is a major part of EPA's action on the model.
      - Adjustment factors for EMFAC2017 reflect the impact of the measures included in EMFAC2021, and EPA expects to also act on these in 2022.
      - Rongsheng Luo (SCAG) asked if there is an ETA on the waiver submittals from CARB. EPA and CARB are expecting the last measures to be submitted before the end of 2021 – CARB's legal team is processing the legal package now to be submitted to EPA.
      - Rongsheng Luo (SCAG) asked assuming the last measures are submitted by the end of 2021, does EPA have an ETA on approval?
      - US EPA: Assuming submittal by mid-December, EPA is shooting for model approval by spring of 2022, and EPA is aware that SCAG needs an approval ASAP.
    - Ozone SIPs:
      - Final approvals for Western Nevada, Eastern Kern, Sacramento, and Western Mojave.
      - Adequacy findings for the San Diego 2008 AND 2015 ozone standard SIP.

- 2008 ozone standard voluntary bump up from serious to severe in Eastern Kern.
      - 2015 ozone standard bump up from moderate to serious in East Kern, Sacramento, and Western Nevada – giving extended attainment date deadline to 2027 and more time to work on SIPs
    - PM-2.5 SIPs
      - Adequacy on SCAQMD PM2.5 post-attainment year budgets for 2020
      - San Joaquin proposal to approve bump up from 2012 PM-2.5 from moderate to serious [Final action published on November 26<sup>th</sup> starting sanction clocks for contingency measures only \(with a protective finding\)](#).
      - Proposed partial disapproval of the 1997 PM-2.5 annual plan [which triggered sanctions and a conformity freeze. Final disapproved was published on November 26<sup>th</sup>](#).
      - Proposed partial disapproval of the contingency measures portion of 1997 PM-2.5 24-hour plan with a protective finding to avoid triggering a conformity freeze.
  - Litigation
    - Please reach out on a case-by-case basis for inquiries on litigation and EPA will determine what can be discussed at individual region's IAC meetings. <https://www.epa.gov/ogc/complaints-and-petitions-review>
  - Sanction Clocks
    - Running sanctions clocks are being tracked, EPA will let any areas know if any get within six months of maturing, but most are expected to be resolved within the two-year period.
    - [https://www.fhwa.dot.gov/Environment/air\\_quality/highway\\_sanctions/sanctionslock.cfm](https://www.fhwa.dot.gov/Environment/air_quality/highway_sanctions/sanctionslock.cfm)
2. FHWA Updates (Joseph Vaughn)
- FHWA will rollout future updates on the new infrastructure bill as soon as they're available.
3. CARB Updates (Nesamani Kalandiyur)
- Staff Updates:
    - Introducing Kevin Hendrawan working on emission benefits calculations for DOT SB 150 reporting and emissions budget development.
  - SIP Updates
    - Board adoptions of three PM-10 maintenance plans: SCAQMD, [\(South Coast\)](#), [Coso Junction](#), and Sacramento (all submitted to US EPA).

- Board approval of San Joaquin Valley PM-2.5 SIP revision.
- General Updates
  - The 2020 Mobile source strategy was approved by the board last month on October 28, 2021. The document identifies the concepts for regulations and programs that maximize emissions reductions to meet various state goals and responds to SB 44. The document can be found on CARB's website: <https://ww2.arb.ca.gov/resources/documents/2020-mobile-source-strategy>
  - CARB is also working on the Draft 2022 SIP Strategy. CARB has been conducting workshops and are looking for comments and feedback with an emphasis on the next ozone SIP. Expecting next draft release early 2022.
- EMFAC Updates:
  - EMFAC2021 model is now available on CARB's website: <https://arb.ca.gov/emfac/>
  - CARB encourages testing, comments, and suggestions.
  - CARB is working with US EPA staff to respond to technical questions, and CARB and US EPA legal teams are working together for submissions of all needed waivers for approval of EMFAC2021 and EMFAC2017 adjustment factors.
- SB 375 Program Updates:
  - Many MPOs are working on their third SCS.
  - Working with the San Joaquin Valley MPOs on the technical methodology review.
  - SACOG, SCAG, and MTC have adopted their third SCSs, and SANDAG's is expected next month.
  - CARB will be hosting a workshop on December 7<sup>th</sup>, 2021 from 5-7 pm regarding the next SB 150 report for September 1<sup>st</sup>, 2022.
    - Receiving more feedback on the SB 150 process as well as the 2022 Scoping Plan.

#### 4. Caltrans Updates: (Rodney Tavitas)

- Staff Updates:
  - Amie Mohai has accepted a promotion in the Division of Rail and Mass Transit, and AQ branch will be backfilling her position.
  - The Air Quality Branch has now merged with the Climate Change Branch under Leah Fisher as the Office of Air Quality and Climate Change.
- 2021 Conformity Status Table Update: (Lucas Sanchez)
  - An updated ADA-compliant conformity status table will be posted on our website. The table will also be sent out to via statewide email list.

- Please be patient with the AQ Branch webpage while we migrate materials to reflect the new Division re-org and merging with Climate Change.
- Clarification on Exempt Project Determinations Update: (Rodney Tavitas)
  - The AQ branch proposes considering roundabouts as a future addition to the guidance as a possible exempt project category per 40 CFR 93.126, for AQ, climate change, and safety benefits.
- CT-EMFAC2021 Updates: (Scott Fredrickson, Division of Environmental Analysis (DEA))
  - DEA introduces Daisy Laurino and Jeff Hamm as new staff.
  - CT-EMFAC2021 has been beta tested and finalized per the current version of EMFAC2021.
  - Use of CT-EMFAC2021 for project-level conformity purposes is pending US EPA approval of the general EMFAC2021 model, and future updates will be made to reflect the latest versions and adjustment factors for EMFAC2021.
- FSTIP Update (Jacqueline Kahrs, Division of Financial Programming)
  - Per implementation of E-FSTIP in 2021, all air quality conformity documentation for FTIPs and corresponding amendments will be included in CTIPS database.
  - Currently working on a virtual workshop for the 2023 FTIP and FSTIP, hopefully in February 2022.
  - Important dates (reminders):
    - August 30<sup>th</sup>, 2022 deadline for MPOs to send the draft FTIP to Caltrans.
    - September 30<sup>th</sup>, 2022 deadline for final FTIP submittals to Caltrans.
    - October 10<sup>th</sup>, 2022 public participation comment period begins.
    - November 16<sup>th</sup>, 2022 Caltrans HQ submission of 2023 FSTIP to FHWA/FTA.
    - Hoping for federal approval in December of 2022.
  - Expect future updates at spring 2022 SWCWG.
- Other Topics:
  - A District 4 (D4) project includes ramp-metering at 50+ locations and ramp widening at about 30 locations (not extending beyond the gore point).
  - Questions for EPA:
    - How should the project be presented to IAC? Would the District submit one large/comprehensive PM assessment/review form and all traffic info for IAC concurrence?
    - FHWA follow up question: Is it one NEPA document?
    - Caltrans: Yes.

- FHWA: we must issue a project-level conformity determination to further the project in a way that supports the NEPA document.
- Caltrans: when the district brings the project to IAC, would the AQCTF concur on all 50 locations at one time?
- US EPA: Do you know why they were all bundled together?
- D4: the sponsor is wanting to upgrade the ramp meters in all of those locations, and project management thought this would streamline improvements for the entire corridor rather than one ramp at a time.
- US EPA: it's up to the district how they want to present it to IAC. Concurrence is needed for the NEPA document, though it would be difficult to review all the traffic information at one time. I recommend discussing in more detail offline. Please give the IAC group materials well ahead of the meeting they'll be discussed at for sufficient time for review.
- District 4 plans to present this project at the next IAC meeting (MTC AQCTF on December 2<sup>nd</sup>).

## 5. Status of Transportation and Air Quality Planning

- MPO/Air District Updates:
  - SACOG (Renee Devere-Oki and Shengyi Gao)
    - Type 4 MTIP amendment waiting for approval.
    - Working on emission budgets for 2015 ozone standard.
    - SACOG has a technical question on developing new motor vehicle emission budgets (full model run vs. "short" version of full model run). SACOG has asked this offline via email and are still seeking clarification on necessary steps. US EPA and CARB are willing to discuss specifics later offline via email or meeting. SACOG will include MTC.
    - Caltrans HQ question: can you describe the pending amendment above?
    - SACOG: went to the board about a month ago, the project is fully modeled but needs to be added to the TIP. Unsure whether it has been submitted to FHWA/FTA yet.
    - Division of Programming: the amendment has been submitted to Caltrans, awaiting uploading to CTIPS prior to submission to FHWA/FTA.
  - SCAG (Rongsheng Luo)
    - Received approval for final conformity determination for the 2021 FTIP on April 16<sup>th</sup>, 2021.
    - Regional council adopted a conformity determination for the first amendment to the 2020 RTP/SCS Connect SoCal.

The analysis has been submitted to FHWA/FTA with an anticipated approval early 2022.

- SCAG has completed all regional transportation model runs and started regional emission model runs for concurrent 2021 FTIP modeling amendment, 2023 FTIP, and 2020 RTP/SCS consistency amendment before August 15<sup>th</sup> end of EMFAC2017 grace period for use in regional conformity analysis. Since that time, all emission model runs have been completed.
- SCAG is aware that EMFAC2021, once approved by US EPA, may resolve some of the budget shortfalls in the current lockdown which could trigger a new set of model runs for the 2023 FTIP and 2020 RTP/SCS consistency, only if necessary. Otherwise, there will be some non-modeling (exempt) projects in January following the usual 2023 FTIP schedule.
- Air quality planning: preparing Appendix 4C regional transportation strategy and control measures for SCAQMD's 2022 AQMP, planning to ask regional council to approve transmittal of draft Appendix 4C to SCAQMD early 2022 to be included in overall draft for public review. Final 2022 AQMP is due to US EPA August 2022.
- Caltrans HQ question: how are SCAG's regional emissions results looking based on EMFAC2021 testing?
- SCAG: overall they help, but there are still some shortfalls, so SCAG is working with partner AQ planning agencies for resolution.
- MTC (Harold Brazil)
  - Commission adoption of new 2050 Plan Bay Area on October 21<sup>st</sup>, 2021 + corresponding EIR. Additionally adopted/approved amendment to 2021 FTIP.
  - New plan is \$1.4 trillion in investments to promote affordable housing, permanently affordable homes, and multiple transit reforms to reduce costs on low income households.
  - The conformity analyses used EMFAC2017, though the EIR used EMFAC2021 for inventories and emission analyses.
- San Joaquin Valley (Ryan Niblock and Alex Marcucci)
  - Working on 2022 RTP/SCS, anticipating drafts in late spring for approval by boards in summer, and final approval by end of 2022.
  - Also includes 2023 FTIPs on same schedule. Reminder: conformity emission modeling began prior to EMFAC2014 expiring for use in conformity analyses.

- EMFAC2017 testing does not provide sufficient reductions for valley MPOs to continue to demonstrate conformity.
- EMFAC2021 testing results look more inline with EMFAC2014, so the Valley looks forward to US EPA action on EMFAC2021. However, the region does not anticipate having enough time to re-model everything with public reviews as early as March 2022, so again they will be relying on EMFAC2014 throughout planning document updates.
- SANDAG (Sam Sanford)
  - Last month, adequacy findings were issued for transportation conformity purposes for the 2008 and 2015 ozone standards, SANDAG thanks US EPA, Caltrans, CARB, and the local AQ management district for good timing between conformity determinations.
  - RTP/SCS and corresponding EIR going to board in December using new adequate budgets, as well as an RTIP consistency amendment.
  - 2023 RTIP update will also use new budgets.

#### 6. Information Sharing

- Next meeting will be held in May 2022.