February 1, 2008

Mr. Wayne Nastri  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Mr. Nastri:  

I am writing to provide the U.S. Environmental Protection Agency (U.S. EPA) with additional technical information supporting the reasonable further progress (RFP) demonstrations for the South Coast and the San Joaquin Valley ozone State Implementations Plans (SIP). ARB submitted the South Coast and the San Joaquin Valley SIPs, including RFP demonstrations, on November 20, 2007 and November 28, 2007 respectively.

The additional information relates to the calculated benefits of the pre-1990 federal motor vehicle program in both RFP demonstrations. Under federal law, states cannot take credit for the benefits of the pre-1990 federal motor vehicle toward meeting RFP requirements. For the San Joaquin Valley, we also included vehicle activity data consistent with the SIP and transportation conformity budgets submitted in November but inadvertently left out of the RFP calculation.

Over the years, various methods have been used to estimate the benefits of the pre-1990 federal motor vehicle program. California used one approach in the SIPs submitted in November 2007. In the attached calculations, ARB used another method now preferred by U.S. EPA. By our accounting, the latest U.S. EPA method underestimates the progress that results from California’s motor vehicle controls by overestimating the residual benefits of the pre-1990 federal motor vehicle program. Nevertheless, both the RFP calculations in the November submittals and the information provided here show the required progress.

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](http://www.arb.ca.gov).
We look forward to working with U.S. EPA to secure approval of California’s ozone SIPs. If you have any questions, please feel free to contact me, at (916) 445-4383, or Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739.

Sincerely,

/s/

James N. Goldstene
Executive Officer

Enclosures

cc: See next page.
cc: Dr. Deborah Jordan, Director
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Air Resources Board