



U.S. Department of Transportation
and
U.S. Environmental Protection Agency



Kurt Karperos, Chief
Air Quality and Transportation Planning Branch
Planning and Technical Support Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

AUG 01 2006

SUBJECT: Use of the Latest Planning Assumptions in California's Vehicle Emissions Model

Dear Mr. Karperos:

Over the past year, Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Environmental Protection Agency (EPA) and California Air Resources Board (CARB) have been discussing the issue of updated vehicle fleet data for use in transportation conformity determinations. On January 31, 2006, CARB sent a letter to FHWA, FTA, and EPA outlining the approaches that will be used, in both the short- and long-term, to update the vehicle fleet data. That letter explained that the most updated vehicle fleet data will be available for state implementation plan (SIP) development in November 2006 as part of the release of EMFAC2007. Additionally, CARB included a long-term commitment to update the vehicle fleet data every three years, independent of the emissions model updates. We would like to thank CARB for their letter and commitment and would like to further clarify our policies regarding use of updated vehicle fleet data in this letter.

The Clean Air Act, the Transportation Conformity Rule and joint EPA/FHWA guidance released in January of 2000 "*Use of Latest Planning Assumptions in Conformity Determinations*," require the use of latest available planning assumptions in conformity determinations. According to the guidance, assumptions older than five years should be updated unless a valid technical justification is available. The guidance also states that the "latest planning assumptions" means that the conformity determination is based on the most current information available to State and local planners. The Federal agencies consider new vehicle fleet data to be available for transportation conformity purposes if it is available for SIP development. This is consistent with the interpretation the Federal agencies provided in 2002 regarding updated vehicle fleet data.

The vehicle fleet data in EMFAC2002 is now five years old. EMFAC2007, with updated fleet data, will be released for SIP development in November 2006. CARB has explained that the newly processed vehicle fleet data is not compatible with EMFAC2002. The EMFAC2007 update relies on vehicle fleet data processing algorithms that are different from those used in EMFAC2002. Therefore, we found it reasonable to provide CARB with some period of time,

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FHWA

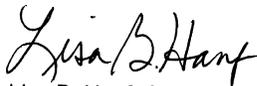
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after the data was available for SIP purposes, to make the updated vehicle fleet data available for use in transportation conformity determinations. We concluded that six months would be a reasonable transition period to incorporate the updated vehicle fleet data into the conformity process. Consequently, conformity determinations, where the emissions modeling is started more than six months after CARB releases EMFAC2007 for SIP development purposes (tentatively after May 2007), must use the updated vehicle fleet data. We understand that the updated vehicle fleet data will only be available by using EMFAC2007 since CARB has elected not to update the vehicle fleet data in EMFAC2002.

The transportation conformity impacts of this approach should be minimal since metropolitan planning organizations (MPOs) have options for conformity analyses started during the transition period. If an MPO begins a conformity analysis during the six-month transition period, they can continue to use the existing version of EMFAC2002. Alternatively, an MPO could choose to use EMFAC2007 with updated fleet data as long as they adopt their conformity determination after EPA approves EMFAC2007 for use in SIPs and conformity determinations, which is expected to be in the summer of 2007.¹

CARB's long-term commitment to update the vehicle registration data every three years, independent of future EMFAC model updates, should eliminate issues related to the age of vehicle fleet data in the future. The efforts of all the agencies in developing an approach that meets the federal transportation conformity requirements and guidance, while ensuring progress towards implementing the new air quality standards, are very much appreciated.

Sincerely,



Lisa B. Hanf, Chief
Planning Office,
EPA Region IX
Air Division



Sue Kiser, Director
Planning and Right of Way
FHWA
California Division

cc:
Dennis Wade, Air Resources Board
Doug Thompson, Air Resources Board

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¹ Mobile source emissions budgets based on EMFAC2007 are expected to be available for use in late 2007.