
Draft Conformity Determination for the San Luis Transmission Project

The Western Area Power Administration (Western) and the San Luis & Delta-Mendota Water Authority (Authority) are accepting comments on this Draft Conformity Determination during the next 30 days. Written comments can be provided by mail, email, or fax at the addresses listed below by April 25, 2016.

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1. Introduction and Summary

Section 176(c)(1) of the federal Clean Air Act (CAA) requires any agency within the Federal Government that engages in, supports, or in any way provides financial support for, licenses, or permits, or approves any activity, to demonstrate that the action conforms to the applicable State Implementation Plan (SIP) for achieving and maintaining the National Ambient Air Quality Standards (NAAQS) for criteria pollutants before the action is otherwise approved (General Conformity rule).

Western, a power marketing administration within the U.S. Department of Energy (DOE), and the Authority, a California joint powers agency, prepared a Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the proposed San Luis Transmission Project (SLTP). Western is the federal lead agency under the National Environmental Policy Act (NEPA), and the Authority is the State lead agency under the California Environmental Quality Act (CEQA). The Bureau of Reclamation (Reclamation) is a Cooperating Agency. The California Department of Water Resources is a Responsible Agency.

The SLTP, if approved, would cause emissions of ozone precursors from sources that would be located in portions of California that do not attain the NAAQS for ozone. Because Western proposes to construct, operate, and maintain the SLTP, the action will be subject to the requirements of the federal Clean Air Act General Conformity rule for all nonattainment and maintenance areas affected by the direct and indirect emissions from the SLTP. This evaluation of General Conformity was performed for the affected nonattainment and maintenance areas in the San Joaquin Valley Air Basin (SJVAB) and the San Francisco Bay Area Air Basin. Criteria pollutant emissions generated in each area from activities associated with SLTP construction and operation were estimated and compared to the General Conformity *de minimis* thresholds to assess whether a conformity determination is required.

The Draft EIS/EIR released by Western in July 2015 indicated that project-related emissions of nitrogen oxides (NOx) could exceed the General Conformity rule threshold rate applicable in the San Joaquin Valley Air Basin. Other criteria pollutant emissions would not occur at levels exceeding the threshold rates in either the SJVAB or the San Francisco Bay Area Air Basin. Because construction emissions of NOx would exceed the General Conformity threshold in years 2018 and 2019 in the SJVAB, the SLTP requires a General

Conformity evaluation, and Western must make a conformity determination for NOx emitted during construction.

This evaluation finds that the total of direct and indirect emissions from the SLTP will conform to the approved SIP because the ozone precursor emissions of NOx, which are subject to the conformity requirements, will be fully offset by reducing emissions of the same pollutant in the same nonattainment area. To achieve this, Western will fully offset its construction-phase NOx emissions through an enforceable measure that effects emissions reductions equal to or greater than the total of direct and indirect emissions from the action so that there is no net increase in NOx emissions.¹

2. General Conformity Requirements

The General Conformity rule is codified in 40 Code of Federal Regulations (CFR) Part 93 (40 CFR 93), Subpart B, "Determining Conformity of General Federal Actions to State or Federal Implementation Plans." The General Conformity rule applies to all federal actions, except transportation-related programs and projects, which are subject to a separate rule promulgated by the U.S. Department of Transportation (U.S. DOT).

As defined in the CAA, Title I, Section 176(c)(1), conformity means to uphold air quality goals for the purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of the NAAQS. Accordingly, a proposed action or activity achieves conformity if the associated pollutant emissions would not:

- Cause or contribute to new violations of any NAAQS in any area;
- Increase the frequency or severity of any existing violation of any NAAQS in any area; or
- Delay timely attainment of any NAAQS or interim emission reductions or other milestones in any area.

The General Conformity rule and associated guidance from the U.S. EPA (2010) and U.S. DOE (2000) establish the terms and procedures to be used in determining conformity. To summarize, in making a conformity determination, the federal agency must:

- Follow certain reporting [§93.155] and public notice [§93.156] requirements and must consider the comments from any interested parties;
- Demonstrate that one or more criteria for determining conformity are satisfied [§93.158];
- Follow specified procedures in preparing the analysis [§93.159]; and
- Identify the measures necessary to mitigate impacts and the implementation schedule [§§93.160 and 93.163].

The federal General Conformity rule is also incorporated into local regulations. For instance, in 1994, the San Joaquin Valley Air Pollution Control District (SJVAPCD) adopted the federal General Conformity regulations within its Rule 9110, General Conformity. Although the federal General Conformity rule was updated by U.S. EPA in 2010, the SJVAPCD Rule 9110 includes the provisions that were established by U.S. EPA in 1994. Although it is outdated, the version of SJVAPCD Rule 9110 that was adopted by the SJVAPCD on October 20, 1994 was included in the SIP (April 23, 1999; 64 FR 19916). This General Conformity evaluation follows the federal requirements and procedures established in the version of the General Conformity rule (40 CFR 93 Subpart B) most recently revised by U.S. EPA on April 5, 2010 (75 FR 17254) and effective July 6, 2010.

¹ As specified by 40 CFR 93.158(a)(5)(iii).

2.1 Criteria for Determining Conformity

The regulations allow several different ways of determining conformity [§93.158], including through comparisons with the emission budgets in the SIP, creating emissions offsets, or air quality modeling. Conformity can be demonstrated for a project if:

- The emissions are specifically identified and accounted for in the SIP;
- The State agency responsible for the SIP determines that the total emissions from the action, along with all other emissions in the area, will not exceed the SIP emission budget;
- The State makes a written commitment to revise the SIP to include the emissions from the action;
- The Metropolitan Planning Organization for the area determines that the emissions are included in the transportation plan or transportation improvement plan;
- The emissions are fully offset by the reduction of emissions in the same nonattainment or maintenance area, or nearby area of equal or higher classification if the emissions impact the nonattainment or maintenance area; or
- Air quality modeling demonstrates that the emissions will not cause or contribute to new violations of the standards or increase the frequency or severity of any existing violations of the standards.

2.2 Procedures for Conformity Analyses

The regulations specify the procedures to be used in each analysis of conformity [§93.159]. The evaluation must be:

- Based on the latest planning assumptions;
- Based on the latest and most accurate emission estimation techniques available; and
- Based on the total of direct and indirect emissions from the action and must reflect emission scenarios that are expected to occur during: the attainment year specified in the SIP; the last year for which emissions are projected in the maintenance plan; or the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis.

2.3 Reporting and Public Participation

The regulations require Western to follow certain reporting [§93.155] and public notice [§93.156] requirements. The draft conformity determination must be available for 30 days of public comment, and Western must consider the comments on the draft conformity determination that are made by any interested party. The comments and responses to all the comments received on the draft conformity determination must be available upon request within 30 days of release of the final conformity determination.

3. Project Description

Western proposes to construct, own, operate, and maintain approximately 95 miles of new transmission lines within easements ranging from 125 to 250 feet wide through Alameda, San Joaquin, Stanislaus, and Merced Counties along the foothills of the Diablo Range in the western San Joaquin Valley. Western also would upgrade or expand its existing substations, make the necessary arrangements to upgrade or expand existing high-voltage substations, or construct new substations to accommodate the interconnections of these new transmission lines.

The Final EIS/EIR Chapter 2 (Description of the Proposed Project and Alternatives) provides additional detail and defines an Agency Preferred Alternative. The conformity determination is only required for the federal agency-approved alternative. This Draft Conformity Determination for the SLTP is based on the Agency Preferred Alternative, which comprises the Proposed Project in the North, Central and San Luis Segments and the Billy Wright Road Alternative in the South Segment.

4. Project Emissions

The greatest annual rates of emissions caused by the SLTP would be during construction, which would occur during 2018, 2019, and 2020, based on the current construction plan described in Final EIS/EIR Section 2.1.3 (assumptions are presented in Final EIS/EIR Appendix I, Air Quality Emission Calculations).

All project-related emissions are quantified based on the best available forecast of activities. This analysis uses the California Emissions Estimator Model (CalEEMod; version 2013.2.2) software developed by the California Air Pollution Control Officers Association (CAPCOA). This is the most recent version of the CalEEMod software, and it relies on mobile source emission factors from the Air Resources Board (ARB) OFFROAD inventory and EMFAC2011 models. Where project-specific parameters are not yet defined, default and typical settings from CalEEMod are used. Default emission factors used in this analysis appear in the CalEEMod User's Guide Appendix D (July 2013).

The Final EIS/EIR (Appendix I) includes detailed air quality emission calculations and the CalEEMod output reports.

4.1 Construction Emissions

The geophysical location of construction emissions and all alternatives would occur in the San Joaquin Valley Air Basin, and only a limited portion of the emissions related to construction of the new Tracy East Substation would occur in the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), adjacent to the SJVAPCD boundary. Construction emissions would not exceed the General Conformity rule thresholds that apply in the BAAQMD or be likely to contribute to violations of air quality standards in the BAAQMD.

Based on the preliminary estimate of total construction emissions shown in the Final EIS/EIR and in the following Table M-1 (Estimated Construction-Phase Emissions), construction emissions could exceed the NO_x threshold for General Conformity in the SJVAB.

Table M-1. Estimated Construction-Phase Emissions (tons per year)

Proposed Project Totals (by Calendar Year)	NO_x	VOC	PM₁₀	PM_{2.5}	CO
Off-Road Equipment	23.5	1.2	4.8	3.0	28.7
On-Road Vehicles	2.6	0.4	25.1	2.6	5.0
Year 1 (2018)	26.1	1.6	29.9	5.6	33.7
Off-Road Equipment	23.5	1.2	5.6	3.3	28.5
On-Road Vehicles	2.5	0.4	33.6	3.5	5.0
Year 2 (2019)	26.0	1.5	39.1	6.8	33.6
Off-Road Equipment	3.5	0.2	0.9	0.5	4.1
On-Road Vehicles	0.4	0.1	8.8	0.9	0.7
Aircraft	2.7	3.3	0.1	0.1	4.1
Year 3 (2020)	6.6	3.5	9.7	1.5	9.0
Proposed Project Totals (all years)	58.8	6.6	78.8	14.0	76.2

Table M-1. Estimated Construction-Phase Emissions (tons per year)

Proposed Project Totals (by Calendar Year)	NOx	VOC	PM10	PM2.5	CO
Billy Wright Road Alternative (additional to Proposed Project)	1.0	0.2	2.3	0.3	1.3
Agency Preferred Alternative Totals (all years)	59.7	6.8	81.1	14.3	77.5
General Conformity Threshold for San Joaquin Valley Air Basin	10	10	100	100	—
Does Proposed Project or Agency Preferred Alternative Potentially Exceed Conformity Threshold?	Yes	No	No	No	—

Source: Final EIS/EIR Appendix I.

Note: "—" means no threshold applies.

Constructing all segments of the SLTP simultaneously, while unlikely, could result in an exceedance of the General Conformity rule applicability threshold for NOx in the region. Details supporting the air quality emission calculations are presented in the Final EIS/EIR (Appendix I).

4.2 Operation Emissions

During operation, the SLTP would involve routine inspection and maintenance requirements that would not notably increase emissions. The negligible normal operating emissions would comply with SJVAPCD rules and regulations. Therefore, it has been determined that the normal operating emissions do not trigger further general conformity analysis. Details supporting the air quality emission calculations are presented in the Final EIS/EIR (Appendix I).

5. Status of Applicable State Implementation Plans

The federal Clean Air Act requires each ozone nonattainment area to develop an emission inventory as the basis of a SIP that demonstrates how the area will attain the standards by specified dates or maintain attainment. This discussion discusses recent ozone plans and the relevant NOx inventories.

Each applicable SIP includes a planning forecast horizon year and emissions inventory for the forecast attainment year. Historically, ozone planning requirements focused on attaining the federal 1-hour ozone standard that was revoked in 2005, and these plans remain partially in place. Current and upcoming planning efforts focus on attaining an 8-hour ozone standard that is more human health protective than the 1-hour ozone standard.

2004 1-hour Ozone Plan and 2014 Attainment Demonstration Request

In the SJVAPCD jurisdiction, U.S. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan for 1-hour ozone on March 8, 2010. However, U.S. EPA later withdrew the approval on November 9, 2012. Although the 2004 Extreme Ozone Attainment Plan is based on the federal 1-hour ozone standard that was revoked in 2005, many remaining 1-hour ozone plan requirements continue to apply to the SJVAB, and these must be addressed in revisions necessary for the 8-hour ozone plan. On May 6, 2014, the SJVAPCD submitted a formal request that the U.S. EPA determine that the SJVAB has attained the federal 1-hour ozone standard. This attainment designation request has not yet been acted upon, and U.S. EPA indicates that the previous classification of the SJVAB as an extreme nonattainment area under the 1-hour ozone standard and planning requirements for the 1-hour ozone standard continue to apply (U.S. EPA, 2015).

2007 8-hour Ozone Plan and Upcoming 2016 8-hr Ozone Plan

The SJVAPCD's Governing Board adopted the 2007 8-hour Ozone Plan and its amendments in 2007 and 2008, and 2011 to demonstrate attainment of the 1997 ozone standard. This SIP was approved by ARB and U.S. EPA on March 1, 2012. The approval of requirements for transportation control strategies was subsequently withdrawn by U.S. EPA on November 9, 2012 (U.S. EPA, 2015). The U.S. EPA has not established area designations for the 2015 8-hour ozone standard. The plan to address the 2008 ozone standard is under development now and due to be submitted by SJVAPCD to U.S. EPA in July 2016.

The most-recent planning forecasts for ozone precursor emissions inventories will be presented within the SJVAPCD's upcoming 2016 Ozone Plan. However, these inventories are not likely to be approved by U.S. EPA before Western makes a decision on the SLTP.

Other Attainment Plans

Other attainment demonstration or maintenance plans for pollutants in the SJVAPCD include the following plans previously adopted by the SJVAPCD's Governing Board or ARB:

- 2015 Plan for the 1997 PM2.5 Standard
- 2012 PM2.5 Plan
- 2007 PM10 Maintenance Plan
- 2008 PM2.5 Plan
- 1996 Carbon Monoxide Redesignation Request and Maintenance Plan for Ten Federal Planning Areas

Along with being an ozone precursor, NO_x is a PM2.5 precursor and, accordingly, the recent PM2.5 planning inventories include NO_x. In Appendix B of the 2015 Plan for the 1997 PM2.5 Standard, the SJVAPCD adopted NO_x inventories for each calendar year including 2017, 2018, 2019, and 2020. The 2015 Plan for the 1997 PM2.5 Standard appears to provide the most recent NO_x inventory adopted by SJVAPCD as of the time of this General Conformity evaluation.

6. Conformity Analysis

The Draft EIS/EIR released by Western (July 2015) and Section 4 (Project Emissions) of this Draft Conformity Determination, indicate that construction-related emissions of NO_x could exceed the General Conformity rule threshold rate applicable in the SJVAB. Accordingly, the SLTP requires a General Conformity evaluation for NO_x.

6.1 Comparison of Emissions

The SJVAPCD NO_x inventory contains emission budgets for off-road equipment used in construction projects in the SJVAB. These emissions are not designated to specific projects and some are associated with projected regional growth. The emissions caused by the proposed SLTP are not specifically identified in the SIP. Additionally, the proposed SLTP emissions will not be specifically identified in the upcoming (2016) ozone plan because the SJVAPCD developed the inventory before Western commenced the General Conformity evaluation.

The portions of the NO_x inventory that are allocated to off-road equipment, on-road vehicles, and aircraft throughout the SJVAB are shown in Table M-2 (SJVAB NO_x Planning Inventory).

Table M-2. SJVAB NOx Planning Inventory (annual average, tons per day)

Mobile Source Category	2017	2018	2019	2020
Off-road Equipment Subcategory	18.1	16.9	16.1	15.9
On-Road Motor Vehicles Subcategory	118.9	110.2	104.4	96.8
Aircraft Subcategory	2.5	2.5	4.6	4.6
San Joaquin Valley Air Basin NOx Planning Inventory (subcategories above)	139.5	129.6	125.1	117.3
Agency Preferred Alternative Total NOx (average tons per day, over 525 days)	---	0.114 tons per day (average during construction)		
Agency Preferred Alternative (portion of subcategories above)	---	0.09%	0.09%	0.10%

Source: SJVAPCD 2015 Plan for the 1997 PM2.5 Standard (Table B-2).

Emissions from SLTP construction would be limited to approximately 0.1 percent of the inventory of relevant regionally budgeted source categories. However, the proposed construction emissions are not specifically accounted for in the planning inventory. Because SLTP emissions are not “specifically identified and accounted for in the SIP,” Western cannot use this method as a way of determining conformity [§93.158(a)(1)].

Because the SLTP construction emissions are not specifically identified or accounted for in the SIP budgets, and the budgets may not be revised in a manner to accommodate the SLTP, Western proposes to fully offset the construction-phase NOx emissions in order to demonstrate conformity [§93.158(a)(5)(iii)].

6.2 Offsetting Emissions

To fully offset the construction NOx emissions, Western must implement an enforceable measure that effects emissions reductions equal to or greater than the total of direct and indirect emissions from the action so that there is no net increase in NOx emissions [§93.158(a)(5)(iii)].

The emission offsets to be used for the purpose of a conformity determination [§93.158] must be: emissions reductions which are quantifiable, consistent with the applicable SIP attainment and reasonable further progress demonstrations, surplus to reductions required by, and credited to, other applicable SIP provisions, enforceable at both the State and Federal levels, and permanent within the timeframe specified by the program. [§93.152]

Options for mitigating in the form of emission offsets include:

- Surrendering traditional Emission Reduction Credits (ERCs);
- Implementing an agreement or other legally binding instrument to fund an SJVAPCD-administered emission reduction incentive program; and
- Creating surplus emission reductions through other incentive programs, such as a heavy-duty engine program like the Carl Moyer program or the Goods Movement emission reduction program.

Traditional ERCs could be held or retired to demonstrate conformity [§93.158(a)(5)(i)(A)], but this would require Western to obtain ERCs that are otherwise highly valuable for offsetting new stationary sources. Western does not propose to acquire traditional ERCs or identify a source for potentially creating ERCs because the nature and timeframe of the proposed emissions would be limited to construction activities, rather than from stationary sources. Traditional ERCs in the SJVAPCD are better suited for use in the New Source Review program for stationary sources. Western is not proposing to mitigate with ERCs.

For mitigating the types of emissions sources normally associated with construction activities such as those of the proposed SLTP, the SJVAPCD has well-established incentive grant programs. Western proposes to finance and verify off-site reductions through an SJVAPCD-administered incentive program. Mitigation will be in a quantity sufficient to fully offset construction NOx emissions, and the timing of reductions will be contemporaneous with SLTP construction activities [§93.163].

6.3 Description of NOx Reductions

Western consulted with SJVAPCD staff regarding Western's proposal to finance and verify off-site reductions through an SJVAPCD-administered incentive program. SJVAPCD staff confirmed the feasibility of achieving the offsets in a letter to Western dated February 3, 2016. The following are examples of how the SJVAPCD could use Western's funds achieve surplus NOx reductions in SJVAB to mitigate SLTP emissions:

- Grants to businesses and municipalities to replace old trucks with new low-emission trucks;
- Grants to businesses and municipalities to electrify or replace existing diesel-powered off-road equipment;
- Grants to residents to replace fireplaces and non-certified wood burning stoves with clean-burning EPA certified units;
- Grants to residents through the District's Tune-In-Tune-Up program to repair older high-polluting vehicles;
- Grants to residents to purchase cleaner vehicles; or
- Grants to school districts to replace older and high-polluting school buses.

6.4 Conformity Mitigation

The conformity mitigation for the proposed SLTP will achieve verifiable off-site emission reductions in sufficient quantities so that there is no net increase in NOx during construction. Creating 60 tons of off-site NOx reductions is a key requirement of implementing Mitigation Measure AQ-1, as defined in the Final EIS/EIR.

The Final EIS/EIR Mitigation Measure AQ-1 will ensure that the conformity mitigation is measurable and enforceable, through the following key steps:

- Prior to commencing construction, Western will finance and verify implementation of additional off-site emission reduction programs to offset SLTP construction emissions.
- Western commits to enter into an agreement or other legally binding instrument with the SJVAPCD to implement 60 tons of NOx emission reductions, as necessary for the Agency Preferred Alternative.
- The SJVAPCD may administer the emission reduction projects on the behalf of Western.
- Western may require the SJVAPCD to prepare a report demonstrating that the emission reduction projects have achieved 60 tons of successful and actual NOx reductions to demonstrate General Conformity.

The Final EIS/EIR and this Draft Conformity Determination assume that Mitigation Measure AQ-1 will be implemented. The mitigation describes Western's intent to enter into an agreement to fund off-site emission reduction projects. Because completing the offsets will require action by the SJVAPCD and its Governing Board, Western will need a commitment from SJVAPCD to implement Western's proposed

mitigation, and this commitment may be in the form of a formal agreement or other legally binding instrument.

Preliminarily, Western expects the agreement to include:

- Western's commitment to finance and verify 60 tons of NOx emissions reductions for General Conformity and for CEQA purposes, as necessary for implementation of the Agency Preferred Alternative.
- Separate from General Conformity, the agreement will also express Western's commitment to achieve 82 tons of PM10 emissions reductions for CEQA purposes, as necessary for implementation of the Agency Preferred Alternative.
- A commitment by SJVAPCD to accept payment by Western of the mitigation fee to be used for air quality benefit programs to reduce NOx and PM10 for General Conformity and for CEQA purposes, preferably in the Northern Region of the SJVAPCD, which is San Joaquin County, Stanislaus County, and Merced County.
- A commitment by SJVAPCD to demonstrate that the emission reduction projects achieve reductions that are real, surplus, quantifiable and enforceable [as emissions offsets are defined in §93.152] for the duration of SLTP construction, and a commitment by SJVAPCD to provide the demonstration to Western in a report.
- Western's commitment to pay the air quality mitigation fee to the SJVAPCD no later than five months prior to commencing construction.
- The actual amount of the mitigation fee for General Conformity and for CEQA purposes is yet to be determined. The amounts may be similar those specified in SJVAPCD Rule 9510 (Indirect Source Review): \$9,350 per ton of NOx reductions; \$9,011 per ton of PM10. The sum may include a 5 percent administration fee to cover the SJVAPCD's cost of administering the benefit programs. Accordingly, the fee for SLTP emission reductions would be approximately \$1,300,000, and the 5 percent administration fee would be approximately \$65,000; the total sum required of Western would be approximately \$1,365,000.

6.5 Implementation Schedule

The Record of Decision would contain stipulations to assure that the SLTP and the implementation of the emission reductions would meet conformity requirements for the SJVAB. Construction could not begin until Western and SJVAPCD execute an agreement to implement and verify the emission reductions, and the reductions would occur after Western pays the mitigation fee.

Guidelines for implementing General Conformity in the NEPA process (U.S. DOE, 2000) show that Western's Record of Decision (ROD) must briefly describe the conformity determination. The ROD will:

- Include the commitments to implement the mitigation measures and offsets needed to achieve conformity; and
- Reference the preparation of a NEPA mitigation action plan to implement the conformity mitigation and the offset commitments.

The ROD may be issued before Western makes a Final Conformity Determination for SLTP, but activities causing emissions may not commence without enforceable mitigation. In the event that Western has not made a Final Conformity Determination at the time of issuing the ROD for SLTP, the decision could not be

implemented (i.e., construction could not begin) until after the Final Conformity Determination and responses to public comments on this Draft Conformity Determination are issued (U.S. DOE, 2000).

The commitment to achieve verifiable off-site emission reductions must be in place before emissions from the action start. Western may make implementation of its decision contingent upon establishing a commitment by SJVAPCD to implement the conformity mitigation or upon executing an agreement to fulfill the mitigation,² after which the Final Conformity Determination could be made. As the federal lead agency under NEPA, Western is required to enforce compliance with all mitigation measures contained in the ROD.

7. Finding of Conformity

This Draft Conformity Determination finds that the ozone precursor emissions of NO_x that are subject to the conformity requirements will be fully offset by reducing emissions of the same pollutant in the same nonattainment area. To achieve this, Western will fully offset its construction-phase NO_x emissions through an enforceable measure that effects emissions reductions equal to or greater than the total of direct and indirect emissions from the action so that there is no net increase in NO_x emissions.

Prior to determining that the action is in conformity, Western must obtain a written commitment from SJVAPCD to implement off-site emission reduction projects on the behalf of Western, and the SJVAPCD must commit to demonstrating that the emission reduction projects have achieved 60 tons of successful and actual NO_x reductions, for implementation of the Agency Preferred Alternative. Upon obtaining these commitments, Western may make a positive conformity determination for the SLTP.

Responses to all comments received on this Draft Conformity Determination will be presented in the Final Conformity Determination.

8. References

CalEEMod (California Emissions Estimator Model). 2013 CalEEMod User's Guide. Appendix A and Appendix D. Version 2013.2.2. July 2013.

U.S. DOE. 2000. Clean Air Act General Conformity Requirements and the National Environmental Policy Act Process.

U.S. EPA. 2010. General Conformity Training Module. Available at: http://www3.epa.gov/airquality/genconform/training/files/General_Conformity_Training_Manual.pdf.

U.S. EPA. 2015. Status of SIP Requirements. Available at: http://www3.epa.gov/airquality/urbanair/sipstatus/reports/ca_areabypoll.html.

² 40 CFR 93.160(b) and (f); and U.S. EPA General Conformity Training Module, Section 3.5.4. (Schedule for demonstration measures). [http://www3.epa.gov/airquality/genconform/training/03_mod_3_Sec_3-5.html]