



October 25, 2022

Mr. Samir Sheikh  
Executive Director  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726

**RE: 2018 PM2.5 Plan Withdrawal**

Dear Mr. Sheikh:

The San Joaquin Valley Regional Planning Agencies are aware that on October 5, 2022, EPA Region 9 indicated that they would be proposing disapproval of the 2018 PM2.5 Plan, for the 2012 PM2.5 Standard. As part of this proposed disapproval, we anticipate a corresponding disapproval of transportation conformity emissions budgets. Such an action would result in a conformity “freeze” for the Regional Transportation Planning Agencies of the San Joaquin Valley, which would inhibit our ability to add or modify projects that are non-exempt from conformity demonstrations. Further, depending on the timing of eventual approvals or disapprovals of a revised 2018 PM2.5 Plan, the Valley could end up subject to a “conformity lapse,” which could result in sanctions and an eventual loss of significant funding to the region.

The San Joaquin Valley Regional Planning Agencies are committed to working with all relevant agencies to deliver a 2018 PM2.5 Plan that meets the expectations of stakeholders and the public. At the same time, we would like to navigate the disapproval/approval process in such a way that it minimizes the impact to our planning and project delivery process. As such, the San Joaquin Valley Regional Planning Agencies support withdrawing the Plan and avoiding final disapproval action by EPA. We expect that this would allow us to avoid triggering a conformity “freeze” or sanction clocks, and allow adequate time to revise the Plan for consideration by EPA at a later time.

We thank you for your time and consideration.

Sincerely,

Diane Nguyen  
Executive Director for the San Joaquin Council of Governments  
Chair of the San Joaquin Valley Regional Planning Agencies' Directors' Committee

San Joaquin  
Council of  
Governments  
Diane Nguyen - Chair

Tulare County  
Association of  
Governments  
Ted Smalley - Vice Chair

Kern  
Council of  
Governments  
Ahron Hakimi

Madera County  
Transportation  
Commission  
Patricia Taylor

(559) 266-6222  
(559) 314-6015 (Fax)



<http://sjvcogs.org>



Stanislaus  
Council of  
Governments  
Rosa Park

Merced County  
Association of  
Governments  
Stacie Guzman

Kings County  
Association of  
Governments  
Terri King

Fresno  
Council of  
Governments  
Tony Boren

555 E Weber Avenue  
Stockton, CA 95202