



## REGION 10

SEATTLE, WA 98101

April 23, 2025

Ms. Leah Feldon  
Director  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Re: Adequacy Finding for the Klamath Falls Fine Particulate Matter Area Redesignation Request and Maintenance Plan

Dear Ms. Feldon:

The purpose of this letter is to inform you that the U.S. Environmental Protection Agency has found the motor vehicle emissions budgets in the Klamath Falls Fine Particulate Matter (PM<sub>2.5</sub>) Area Redesignation Request and Maintenance Plan (the plan) adequate for transportation conformity purposes. As a result of this adequacy finding, the Oregon Department of Environmental Quality, Oregon Department of Transportation, and the U.S. Department of Transportation are required to use these budgets in regional transportation conformity emissions analyses.

The plan was submitted to the EPA on August 20, 2024, to address maintenance planning and redesignation requirements for the 2006 24-hour PM<sub>2.5</sub> NAAQS. We announced receipt of the plan on the EPA's Office of Transportation and Air Quality web site on September 5, 2024, and requested public comment on the submitted motor vehicle emissions budgets by no later than October 7, 2024. We received no comments during the comment period.

The EPA reviewed the submitted plan and the motor vehicle emissions budgets contained in the plan, which were developed using the Motor Vehicle Emissions Simulator on-road model and have determined the motor vehicle emissions budgets adequate for transportation conformity purposes, consistent with 40 CFR 93.118(e)(4) of the Transportation Conformity Rule (40 CFR part 93, subpart A).

We believe it is appropriate to find the motor vehicle emission budgets in the submitted plan adequate for transportation conformity purposes while the EPA continues to review the other aspects of the plan. This adequacy finding only pertains to the motor vehicle emissions budgets in the submitted plan and is separate from our review of the plan. Our adequacy determination is not a determination that the plan meets the requirements for approval. The adequate budgets are listed in the following table.

Adequate Motor Vehicle Emissions Budgets  
For 24-hour PM<sub>2.5</sub> NAAQS in the Klamath Falls Nonattainment Area for a Typical Season Day (TSD)

| PM <sub>2.5</sub><br>Emissions<br>(lbs/day) |                  | NO <sub>x</sub><br>Emissions<br>(lbs/day) |                  |
|---|------------------|---|------------------|
| 2017 Attainment<br>Year                     | 2037 Future Year | 2017 Attainment<br>Year                   | 2037 Future Year |
| 64  | 77               | 2149                                      | 1448             |

The motor vehicle emissions budgets meet the adequacy criteria found in 40 CFR 93.118(e)(4)(iv) as detailed in the enclosed "Transportation Conformity Adequacy Review." The motor vehicle emissions budgets serve to strengthen the Oregon state implementation plan through continued attainment and ensure that the motor vehicle emissions remain consistent with the emissions levels provided for in the plan.

A copy of this letter and its enclosure will be posted on the EPA's Office of Transportation and Air Quality web site.<sup>1</sup> The EPA's adequacy finding for purposes of transportation conformity is not dispositive of the EPA's ultimate approval or disapproval of the submitted plan.

The EPA intends to publish a notice of this adequacy determination in the Federal Register and the determination will become effective 15 days after the Federal Register publication. If you have any questions, please contact Tess Bloom of my staff at (206) 553-6362 or bloom.tess@epa.gov.

Sincerely,

Krishna Viswanathan  
Director  
Air and Radiation Division

cc: Ms. Ashley Bryers  
Federal Highway Administration

Ms. Jasmine Harris  
Federal Highway Administration

Ms. Natalie Liljenwall  
Oregon Department of Transportation

Mr. Michael Orman  
Oregon Department of Environmental Quality

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<sup>1</sup> <https://www.epa.gov/state-and-local-transportation/state-implementation-plans-sip-submissions-epa-has-found-adequate-or>

**Transportation Conformity Adequacy Review**

***Klamath Falls PM<sub>2.5</sub> Redesignation Request and Maintenance Plan***

***Submitted August 20, 2024***

Adequacy Determination of Motor Vehicle  
Emissions Budget 40 CFR 93.118 (e) (4)

(4) The EPA will not find a motor vehicle emissions budget in a submitted control strategy implementation plan revision or maintenance plan to be adequate for transportation conformity purposes unless the following minimum criteria are satisfied:

**40 CFR 93.118(e)(4)**

| <b><i>Adequacy Review Criteria</i></b>  | <b><i>Is this Criterion Satisfied?</i></b> | <b><i>Reference in SIP Documents/Comments</i></b>   |
|---|--|---|
| (i) The submitted control strategy implementation plan revision or maintenance plan was endorsed by the Governor (or his or her designee) and was subject to a state public hearing;  | Yes  | The plan was filed by the Governor of Oregon's designee, Leah Feldon, Director of the Oregon Department of Environmental Quality (ODEQ) on August 20, 2024. The plan was subject to a public hearing that took place on April 29, 2024. A certification of the public hearing was enclosed with the SIP submittal to the EPA in the cover letter and page 17 of Attachment 1.1.   |
| (ii) Before the control strategy implementation plan or maintenance plan was submitted to the EPA, consultation among federal, state, and local agencies occurred; full implementation plan documentation was provided to the EPA; and the EPA's stated concerns, if any, were addressed; | Yes  | A draft of the proposed redesignation request and maintenance plan was submitted to the EPA Region 10 prior to the state public comment period and state adoption on May 23, 2024. The EPA Region 10 provided both consultation prior to the opening of the state public comment period, in addition to comments formally submitted during the state public comment period. ODEQ's document titled, "Oregon Environmental Quality Commission Meeting, Rulemaking Action Item B," dated May 23, 2024, states ODEQ's responses to the EPA's comments. Additionally, ODEQ consulted with the EPA Region 10 throughout the development of the redesignation request and maintenance plan. |

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| (iii) The motor vehicle emissions budget(s) is clearly identified and precisely quantified;  | Yes | Appendix 3 of the Klamath Falls redesignation request and maintenance plan clearly lists the motor vehicle emissions budgets (MVEBs) for a "typical season day." Budgets are established for both PM <sub>2.5</sub> and NO <sub>x</sub> . Typical season day emissions represent a daily average of emissions during the four-month time period occurring from November 1st through February. This period of time is typically when the particulate matter (PM) National Ambient Air Quality Standard (NAAQS) is violated. The MVEBs incorporates both a safety margin and additional emissions allocations from woodstoves that were removed after 2017. |
| (iv) The motor vehicle emissions budget(s), when considered together with all other emissions sources, is consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given implementation plan submission);   | Yes | Table 11 in Appendix 3 of the submitted Klamath Falls Redesignation Request and Maintenance Plan demonstrates that the MVEBs, combined with emissions from other sources, will not exceed emissions from the 2017 attainment year.  |
| (v) The motor vehicle emissions budget(s) is consistent with and clearly related to the emissions inventory and the control measures in the submitted control strategy implementation plan revision or maintenance plan; and   | Yes | The MVEBs are in line with the emissions inventory and control strategies developed.  |
| (vi) Revisions to previously submitted control strategy implementation plans or maintenance plans explain and document any changes to previously submitted budgets and control measures; impacts on point and area source emissions; any changes to established safety margins (see Sec. 93.101 for definition); and reasons for the changes (including the basis for any changes related to emission factors or estimates of vehicle miles traveled). | Yes | ODEQ has not previously submitted a redesignation request and maintenance plan to the EPA for the Klamath Falls area; thus, documentation regarding revisions is not applicable.  |

**40 CFR 93.118(e)(5)**

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| Before determining the adequacy of a submitted motor vehicle emissions budget, the EPA will review the state's compilation of public comments and response to comments that are required to be submitted with any implementation plan. The EPA will document its consideration of such comments and responses in a letter to the state indicating the adequacy of the submitted motor vehicle emissions budget. | Yes | ODEQ provided proof of public notice and public hearing. ODEQ did not receive any comments during the public hearing, and comments received during the state public comment period are listed in the document entitled "Oregon Environmental Quality Commission Meeting, Rulemaking Action Item B," along with responses to comments. |
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