

SACRAMENTO METROPOLITAN



El Dorado County
Air Quality
Management
District



Serving Sutter and Yuba Counties



August 5, 2022

Edie Chang
Deputy Executive Officer – Planning, Freight, & Toxics
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Request to Voluntarily Reclassify the Sacramento Federal Ozone Nonattainment Area (SFNA) from Serious to Severe Nonattainment for the 2015 8-hour Ozone Standard

Dear Edie Chang:

The air districts in the Sacramento Federal Ozone Nonattainment Area (SFNA), which comprise of the Sacramento Metropolitan Air Quality Management District, El Dorado County Air Quality Management District, Feather River Air Quality Management District, Placer County Air Pollution Control District, and Yolo-Solano Air Quality Management District, are requesting a voluntary nonattainment reclassification from our current status of "Serious" to "Severe."

In October 2021, the United States Environmental Protection Agency (EPA) reclassified the SFNA as a "Serious" nonattainment area for the 2015 8-hour Ozone National Ambient Air Quality Standard (NAAQS) (86 FR 59648). The SFNA air districts have been working with the California Air Resources Board (CARB) on the attainment demonstration photochemical modeling. May 2022 modeling results do not support the attainment date for a "Serious" classification of August 2027, but rather a "Severe" classification and attainment date of August 2033. To attain the standard by August 2027, the SFNA would need to reduce 5.6 tons per day (tpd) of NO_x emissions by 2026 as NO_x is the main precursor to the ozone pollution in the SFNA region. This is not practically achievable for the following reasons:

- 1) Mobile sources account for 79% of the SFNA NO_x emissions inventory and 72% of total statewide NO_x emissions in 2026. CARB, which has the primary authority for regulating mobile source emissions, has indicated that the State does not have any additional control measures to further reduce NO_x emissions by 2026. However, the State does have control measure commitments after 2026 that could be used to reduce precursor emissions needed for the SFNA reach attainment. Similarly, EPA, which has direct authority over "federal" mobile sources (i.e.,

airplanes, locomotives, and ships), is also not expected to introduce any new regulations that would help drive NO_x reductions in the Sacramento region. Therefore, with our lack of authority to directly regulate the largest sources of smog pollution in the SFNA, we are constrained and solely reliant on whatever federal or state actions are taken.

2) The SFNA air districts accept responsibility for local stationary and areawide sources. We evaluated the potential NO_x emission reduction options from local sources under our collective authority and have determined, unfortunately, that the region will be unable to achieve the needed NO_x reductions from these sectors by 2026. The total 2026 NO_x emission inventory for the region from source categories under district authority is 8.3 tpd, which represents only 21% of the total SFNA NO_x inventory. This total is just slightly greater than the necessary 5.6 tpd of NO_x reductions. Expecting the necessary emission reductions from this sector alone is unrealistic and infeasible.

3) Background ozone concentrations (including international transport of ozone and other precursors pollutants and the ozone from natural sources) are significant and have been increasing in the SFNA. This contribution to SFNA pollution will persist due to the expected increases in transport of international pollution and the more frequent, intense, and larger wildfires.

In spite of lack of direct authority, the SFNA air districts have long implemented very successful mobile source incentive programs for vehicle and engine upgrades and replacements to help reduce emissions near and in the Sacramento region. Previous and current mobile and area-wide source incentive programs have proven effective for improving air quality, but additional funding to expand and maintain these programs to overcome the ozone burden in our region remains an ongoing need, especially as federal health standards continue to become more stringent.

Similarly, air districts have no control over international transport nor wildfires. While many air districts have implemented prescribed burn programs to support the wildfire risk reduction work being done by land managers, air districts cannot influence emissions throughout Asia where the rapid construction of many new coal fired plants and other emission sources continues unabated. Transport of these emissions to the western United States has offset some of the clean air progress California residents and businesses have achieved.

In conclusion, providing the additional time to attain the 2015 8-hour Ozone NAAQS in the SFNA is necessary because it will allow the State time to adopt and implement the State control measure commitments that is scheduled after 2026 in 2022 State Strategy for the State Implementation Plan (2022 State SIP Strategy). These State control measures, some of which targets mobile sources will help reduce ozone precursor pollutants in California, including the additional emission reductions needed in Sacramento region to meet the 2015 8-hour Ozone standard. Furthermore, the additional time will allow the State and air districts to advocate for the needed federal actions for the sources under

federal authority. Therefore, a reclassification from "Serious" to "Severe" would provide the SFNA a pathway to attainment of the standard by August 2033. This voluntary reclassification request is presented under Clean Air Act Section 181(b)(3), which allows for a voluntary request by a state to EPA for reclassification of a region to a higher level of nonattainment. We ask that CARB submit this request to EPA on behalf of the SFNA air districts. If you have any questions, please contact Mark Loutzenhiser, Manager, Program Coordination Division, the Sacramento Metropolitan Air Quality Management District, at 916-261-6414 or mloutzenhiser@airquality.org.

Sincerely,



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Cc:

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