

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

For Agenda of March 27, 2008

**To:** Board of Directors  
Sacramento Metropolitan Air Quality Management District

**From:** Larry Greene, Air Pollution Control Officer  
Sacramento Metropolitan Air Quality Management District

**Subject:** Approve Sacramento Regional 8-Hour Ozone  
2011 Reasonable Further Progress (RFP) Plan

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**Recommendations**

Staff recommends that the Board approve the Sacramento Regional 8-Hour Ozone 2011 Reasonable Further Progress Plan (Attachment 3).

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**Executive Summary**

This reasonable further progress plan demonstrates that the Sacramento region will meet minimum emission reduction requirements specified in the Clean Air Act as progress towards attainment of the 8-hour ozone National Ambient Air Quality Standard. This plan covers the federal 8-hour ozone nonattainment area, which includes all of Sacramento and Yolo counties and parts of El Dorado, Placer, Solano and Sutter counties.

This plan must demonstrate a total of 27% reduction in volatile organic compounds (VOC) and/or nitrogen oxides (NOx) emissions from 2002 to 2011. The 27% emission reductions are achieved by adopted rules and other control strategies. The plan also includes required motor vehicle emissions budgets for 2011. The budgets remain the same as the previously submitted 2008 budgets.

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**Attachments**

Item	
Resolution	Attachment 1
Notice of Public Hearing	Attachment 2
Sacramento Regional 8-Hour Ozone 2011 Reasonable Further Progress Plan	Attachment 3

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## **Background**

In July 1997, the U.S. Environmental Protection Agency (EPA) promulgated a National Ambient Air Quality Standard (NAAQS) for 8-hour ozone to protect public health. In June 2004, EPA designated the Sacramento region as a serious 8-hour ozone nonattainment area with an associated attainment deadline of June 15, 2013. The Sacramento nonattainment area includes all of Sacramento and Yolo counties and parts of El Dorado, Placer, Solano and Sutter counties.

The federal Clean Air Act (CAA) and EPA 8-hour ozone regulations require nonattainment areas classified “moderate and above” to annually reduce volatile organic compound (VOC) emissions by 3 percent per year to demonstrate reasonable further progress (RFP) toward attaining the ozone standard<sup>1</sup>. The federal Clean Air Act allows the substitution of nitrogen oxide (NOx) reductions for volatile organic compound reductions if NOx reductions are needed to meet the ozone standard<sup>2</sup>. The annual progress requirement is demonstrated at specified milestones, and this plan covers the 2011 milestone. The RFP demonstration plan was required to be submitted to EPA by June 15, 2007.

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## **Reasonable Further Progress**

This plan includes an updated emission inventory for 2002 and 2011 that takes into account socio-economic activity growth and the effects of adopted rules and other control strategies. The VOC and NOx emission forecasts for 2011 show significant declines in emissions, despite increasing population, vehicle activity, and economic development.

Preliminary photochemical modeling shows that the ozone attainment strategy must include reductions of both VOC and NOx emissions, and that NOx reductions are more beneficial than VOC reductions in downwind areas where peak ozone concentrations occur. Therefore, the substitution of NOx emission reductions in place of VOC emission reductions to meet reasonable further progress requirements is consistent with federal ozone regulations and with previous and current analyses of ozone attainment strategies in the Sacramento region.

The RFP requirement for 2011 is for a 27% reduction from 2002 base year emissions. The District has met the RFP demonstration by achieving an 11.4% reduction in VOC and a 15.6% reduction in NOx. In addition, the District has established a 3% NOx reduction surplus for a contingency margin as required by the CAA.

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<sup>1</sup> 42 USCA 7511a(c)(2)(B)

<sup>2</sup> 42 USCA 7511a(c)(2)(C)

## **Motor Vehicle Emissions Budgets**

RFP plans must include motor vehicle emissions budgets for transportation conformity purposes. Under the federal Clean Air Act, federal agencies may not approve or fund transportation plans and projects unless they are consistent with state air quality implementation plans (SIPs). Conformity with the SIP requires that transportation activities not cause new air quality violations, worsen existing violations, or delay timely attainment of the national ambient air quality standards (NAAQS).

In February 2006, the District submitted an early 8-hour ozone RFP plan<sup>3</sup> to EPA, demonstrating that the required minimum reduction from 2002-2008 for the Sacramento nonattainment area could be achieved with existing control strategies. In addition, the 2006 RFP plan included an updated emission inventory and set new motor vehicle emissions budgets for 2008, which EPA found to be adequate for transportation conformity purposes (effective date March 29, 2006)<sup>4</sup>. This allowed SACOG to make the conformity determination for the 2006 Metropolitan Transportation Plan (MTP) and the 2006/08 Metropolitan Transportation Improvement Program (MTIP) for the Sacramento region, lifting the conformity lapse on April 20, 2006 when approved by the Federal Highway Administration.

This 2011 RFP demonstration relies on revised motor vehicle emissions using EMFAC2007 and updated transportation activity data. The motor vehicle emissions budgets for 2011 are being maintained at the 2008 budget levels (previously established based on EMFAC2002.) The 2011 motor vehicle emissions inventory is lower than the 2008 budgets for VOC and higher for NOx. Consequently, SACOG may not make any new conformity findings until new budgets are approved. The Sacramento region intends to make any appropriate motor vehicle budget adjustments through its next attainment plan.

Preliminary information provided by the California Air Resources Board shows that state on-road motor vehicle rules will provide enough emissions reductions to adjust the budgets and allow the required conformity findings for 2011. These numbers will be finalized and the budgets in this plan will be replaced by budgets set in the attainment demonstration plan expected to be considered by your Board later this year. Staff do not expect EPA to find the RFP 2011 budgets adequate for conformity purposes prior to submittal of the attainment demonstration plan.

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<sup>3</sup> Sacramento Regional Nonattainment Area 8-Hour Ozone Rate-of-Progress Plan (February 2006).

<sup>4</sup> Federal Register, March 14, 2006, p. 13124.

## **Public Review Process**

The Draft RFP Plan and notice of public hearing were published on February 26, 2008. The notice was published in the Sacramento Bee, a paper of general circulation in Sacramento County. In addition, the notice was sent electronically to approximately 1200 individuals and mailed to over 2900 interested parties, including representatives from various local, state, and federal governmental agencies and some industry and environmental groups.

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## **Conclusions**

The RFP Plan demonstrates that the Sacramento region will meet the federal 8-hour ozone requirements for reasonable further progress toward attaining the ozone standard from 2002-2011, updates the emissions inventory, and maintains the Motor Vehicle Emissions Budget. Staff recommends adoption of the attached Resolution, which: 1) approves the Sacramento Regional Nonattainment Area 8-Hour Ozone Reasonable Further Progress Plan (Attachment 3), and 2) directs staff to submit the Sacramento Regional Nonattainment Area 8-Hour Ozone Reasonable Further Progress Plan and necessary supporting documentation to ARB for submittal to EPA for inclusion in the State Implementation Plan.

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Respectfully submitted,

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Larry Greene, Air Pollution Control Officer  
Sacramento Metropolitan AQMD

Approved as to form:

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Kathrine Pittard, District Counsel  
Sacramento Metropolitan AQMD

Attachments

**ATTACHMENT 1**  
**RESOLUTION**

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

AQMD Resolution No. \_\_\_\_\_

**WHEREAS** the U.S. Environmental Protection Agency (USEPA) promulgated a new National Ambient Air Quality Standard ("NAAQS") for ozone with an 8-hour averaging time of 0.08 parts per million, and determined that the 8-hour standard is necessary to protect public health (Federal Register, Vol. 62, No. 138, pages 2-37 (July 18, 1997)); and

**WHEREAS** the Sacramento Nonattainment Area ("SNA"), includes all of Sacramento and Yolo counties and parts of Placer, El Dorado, Solano, and Sutter counties (Federal Register, Vol. 69, No. 84, pages 23858-23951 (April 30, 2004)); and

**WHEREAS** the SNA exceeds the primary NAAQS for 8-hour ozone, and has been designated nonattainment for ozone with a classification of "Serious" (Federal Register, Vol. 69, No. 84, pages 23858-23951); and

**WHEREAS** the USEPA published its Final Rule for the implementation of the 8-hour Ozone National Ambient Air Quality Standard, which requires nonattainment areas classified "Serious and Above" to demonstrate reasonable further progress toward attainment of the 8-hour ozone standard (42 U.S.C. 7511a (c)(2)(B)); and

**WHEREAS** the SNA Air Districts have prepared the proposed Sacramento Regional 8-Hour Ozone 2011 Reasonable Further Progress Plan (RFP Plan) to satisfy current reasonable further progress requirements; and

**WHEREAS** the proposed RFP Plan demonstrates that adopted control strategies will provide the emission reductions necessary to meet the Federal Clean Air Act requirements for reasonable further progress for the period 2002-2011; and

**WHEREAS** photochemical modeling by the California Air Resources Board for the State Implementation Plan has concluded that the most feasible ozone attainment strategy must include reductions of both volatile organic compound (VOC) and nitrogen oxide (NOx) emissions and that NOx reductions would be more beneficial than VOC reductions in reducing peak ozone in downwind areas; and

**WHEREAS** the substitution of nitrogen oxide emission reductions in place of volatile organic compound emission reductions to meet reasonable further progress requirements is consistent with Federal Clean Air Act (42 U.S.C.7511a (c)(2)(C)), and with previous and current analyses of ozone attainment strategies in the SNA; and

**WHEREAS** the proposed RFP Plan includes an updated emissions inventory and carries forward the 2008 Motor Vehicle Emissions Budgets to establish Motor Vehicle Emission Budgets for 2011 for transportation conformity purposes; and

**WHEREAS** the Sacramento Metropolitan Air Quality Management District published notice of the availability of the proposed RFP Plan on February 26, 2008; and

**WHEREAS** the Board of Directors of the Sacramento Metropolitan Air Quality Management District issued a public notice on February 26, 2008 and considered public comment on the proposed RFP Plan at its March 27, 2008 meeting; and

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Directors of the Sacramento Metropolitan Air Quality Management District approves the proposed Sacramento Regional 8-Hour Ozone 2011 Reasonable Further Progress Plan, approves the RFP demonstration for the 2011 milestone year, approves the 2002 Baseline Emissions Inventory and 2011 Emissions Inventory Forecast contained in the proposed RFP Plan, and approves the Motor Vehicle Emissions Budgets for 2011 that, if found adequate or approved by the USEPA, the Sacramento Area Council of Governments must use for federal transportation conformity purposes.

**BE IT FURTHER RESOLVED** that the Board of Directors of the Sacramento Metropolitan Air Quality Management District directs staff to forward the Sacramento Regional 8-Hour Ozone 2011 Reasonable Further Progress Plan and all necessary supporting documents to the California Air Resources Board for submittal to the U.S. Environmental Protection Agency as a revision to the State Implementation Plan.

ON A MOTION by Director \_\_\_\_\_, seconded by Director \_\_\_\_\_, the foregoing Resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District, State of California, this 27<sup>th</sup> day of March, 2008 by the following vote,

to wit:

AYES: Directors

NOES: Directors

ABSENT: Directors

\_\_\_\_\_  
Chairperson of the Board of Directors  
Sacramento Metropolitan Air Quality  
Management District

(SEAL)

ATTEST: \_\_\_\_\_  
Clerk of the Board  
Sacramento Metropolitan Air Quality Management District

**ATTACHMENT 2**  
**NOTICE OF PUBLIC HEARING**

# The Sacramento Bee

P.O. Box 15779 • 2100 Q Street • Sacramento, CA 95852

SAC METRO AIR QUALITY  
777 12<sup>TH</sup> ST, 3<sup>RD</sup> FLOOR  
SACRAMENTO, CA 95814

DECLARATION OF PUBLICATION  
(C.C.P. 2015.5)

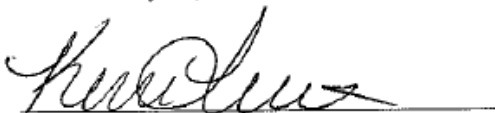
COUNTY OF SACRAMENTO

STATE OF CALIFORNIA

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the printer and principal clerk of the publisher of The Sacramento Bee, printed and published in the City of Sacramento, County of Sacramento, State of California, daily, for which said newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sacramento, State of California, under the date of September 26, 1994, Action No. 379071; that the notice of which the annexed is a printed copy, has been published in each issue thereof and not in any supplement thereof on the following dates, to wit:

**February 26, 2008**

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Sacramento, California, on **February 26, 2008**.



(Signature)

**NO. 467 PUBLIC NOTICE  
NOTICE OF PUBLIC HEARING  
FEDERAL 8-HOUR OZONE REASONABLE FURTHER  
PROGRESS PLAN (RFP)**

The Sacramento Metropolitan Air Quality Management District will hold a public hearing to consider adoption of the Federal 8-Hour Ozone Reasonable Further Progress Plan (RFP) for the Sacramento Federal Ozone Nonattainment Area. The Clean Air Act requires federal 8-hour ozone nonattainment areas to meet a reasonable further progress requirement to reduce ozone-forming pollutant emissions. The Sacramento Federal Ozone Nonattainment Area includes all of Sacramento and Yolo counties, and portions of Placer, El Dorado, Solano, and Sutter counties.

The Plan proposes to use updated emission inventories, existing control strategies, and approved control measure commitments to achieve emission reductions necessary for compliance with the Clean Air Act. The Plan demonstrates that reasonable further progress for the 2011 milestone year is achieved by a combination of volatile organic compounds (VOC) and nitrogen oxides (NOx) emission inventory reductions.

The Plan will be available for review on the Sacramento Metropolitan Air Quality Management District web site at [www.airquality.org](http://www.airquality.org). You may also request a copy at the district office listed below. The Plan will be available on February 26, 2008. The Plan will be considered for adoption by the Air District Board of Directors during the public hearing on March 27, 2008.

By this notice, all interested parties are specifically requested to comment on the proposed Plan. Oral and written testimony may be directed to the Air District Board of Directors at the public hearing, or sent to the district office, as set forth below:

**Hearing Location:**  
Sacramento County Board Chambers,  
700 H Street, Sacramento, CA 95814

**Hearing Date and Time:**  
Thursday, March 27, 2008 9:30 A.M.

**Air District Office Address:**  
777 12th Street, 3rd Flr, Sacramento, CA 95814

**Contact:**  
Steven Lau (916) 874-4800

**ATTACHMENT 3**

**SACRAMENTO REGIONAL 8-HOUR OZONE  
2011 REASONABLE FURTHER PROGRESS PLAN  
(FINAL DRAFT)**