

November 30, 2007

Jason Crow, Senior Planner
Sacramento Area Council of Governments
1415 L Street, 3rd Floor
Sacramento, CA 95814

Dear Mr. Crow,

I am pleased to submit the Sacramento Metropolitan Air Quality Management District's (SMAQMD) PM₁₀ Redesignation Request and Maintenance Plan Program application for SACOG's Air Quality Funding Program.

The SMAQMD is requesting \$132,795 in federal Congestion Mitigation and Air Quality Improvement (CMAQ) funding for the two-year funding cycle. The money would be used to help fund the PM₁₀ Redesignation Request and Maintenance Plan development process. The air district will provide adequate funds from the FY 2008-2009 budget for the necessary local match.

If you have any questions regarding this application or require additional documentation, please contact Charles Anderson at (916) 874-4831 or canderson@airquality.org.

Sincerely,



Larry Greene
Air Pollution Control Officer

**Air Quality Funding Program
CMAQ Grant Project Application**

Project Title	PM ₁₀ Redesignation request and Maintenance Plan
Lead Applicant	Sacramento Metropolitan Air Quality Management District (SMAQMD)
Lead Person	Charles L. Anderson Program Coordinator, Plan Coordination 777 12 th Street, 3 rd Floor Sacramento, CA 95814 canderson@airquality.org Office: 916-874-4831 Fax: 916-874-4899
Partner Organizations	None
Grant Type	B
Air Quality Improvement Plans Funds Requested	Federal funds requested for the air district is \$132,795.
Local Match	The local Air District will match \$17,205 from the FY 2008-2009 budget.
Minimum Amount to Conduct Project	Submittal of the Redesignation and Maintenance Plan is for the benefit of the Sacramento PM ₁₀ nonattainment area. If the funding were not fully granted, local air quality district funding would have to be re-prioritized. This would further delay the redesignation procedures and the unnecessary restrictions due to nonattainment status.
Project Description	The United States Environmental Protection Agency (USEPA) recognizes that current air quality data shows that the Sacramento area currently attains the Federal PM ₁₀ standard ¹ , but the Sacramento area has not yet been formally redesignated as attainment. Federal law requires that the Air District prepare and submit a maintenance plan to request formal redesignation to attainment. Key elements of the maintenance plan include: the evaluation of the PM ₁₀ air quality trends, establishing base year and future year emission inventories, performing Chemical Mass Balance modeling analyses, and preparing a contingency plan if necessary. The plan will also establish a Particulate Matter (PM ₁₀) Motor Vehicle Emission Budgets as required by Transportation Conformity Rules. The Air District will also conduct public outreach and education on the region request for redesignation and solicit input for potential control measures to be implemented in the maintenance plan. This effort would also include conducting public workshops, hearings, and preparation of necessary Environmental Documents to meet the requirements under California Environmental Quality Act (CEQA).

¹ 67FR7082, Clean Air Act Attainment Finding; Bullhead City and Payson Nonattainment Areas, AZ; Sacramento and San Bernardino Nonattainment Areas, CA; Particulate Matter of 10 Microns or Less (PM-10)

PROJECT DESCRIPTION

Project Type: Category B - Air Quality Improvement Plans

Project Description:

The Sacramento Metropolitan Air Quality Management District (SMAQMD/Air District) was designated as a moderate nonattainment area for particulate matter of 10-micron or less (PM₁₀) under Title I, Part D of the federal Clean Air Act Amendments of 1990 (CAAA) (56 FR 16274). This designation required the Air District to submit the PM₁₀ State Implementation Plan and attain the PM₁₀ air quality standard by December 31, 2000. The 1998-2000 air monitoring data showed that the Air District achieved the air quality standard for PM₁₀. The United States Environmental Protection Agency (USEPA) in their final rule¹, which is published on February 15, 2002, effective on March 18, 2002, officially determined that the Air District has attained the PM₁₀ standard. A formal request from the Air District with evidence showing that the region will not violate the standard is required to be submitted for redesignation to attainment status. The Air District is pursuing a request for redesignation to attainment status and preparing a maintenance plan for PM₁₀ standard.

Project Evaluation:

In order to acquire the attainment redesignation, the CAAA Section 107(d)(3) requires the USEPA administrator to make five findings prior to granting a request for redesignation. These include:

1. The USEPA has determined that the National Ambient Air Quality Standards (NAAQS) have been attained.
2. The applicable implementation plan has been fully approved by USEPA under CAAA section 110(k).
3. The USEPA has determined that the improvement in air quality is due to permanent and enforceable reductions in emissions.
4. The USEPA has fully approved a maintenance plan for the area, including contingency plan, under CAAA section 175A.
5. The state has met all applicable requirements for the area under CAAA section 110 and Part D.

Since the USEPA has already determined the Sacramento nonattainment area attained the Federal PM₁₀ standards, the Air District is required to prepare a maintenance plan to satisfy the remaining requirements for redesignation. The CAAA requires the maintenance plan to provide for the maintenance of the PM₁₀ standard for at least 10 years after the redesignation.

The redesignation request and maintenance plan will be an up-to-date assessment of the region's PM₁₀ status. It will outline ambient air quality trends, current emission inventories, monitoring programs, contingency plans, and if needed, new control measures.

Although federal law does not mandate the submittal of the redesignation request and maintenance plan, the nonattainment status of the PM₁₀ standards limits the growth of the region. The PM₁₀ redesignation and an approved maintenance plan will provide a clear picture and direction for PM₁₀ in the Sacramento region. The Air District anticipates submitting the plan by

the mid 2009 if adequate funding is awarded. Full funding is critical in ensuring an accurate assessment of the region's air quality and the maintenance plan.

The Air District is likely to be designated as nonattainment under the new federal fine particulate matter (PM_{2.5}) standard. The Air District has started evaluating possible control measures and preparing information for the PM_{2.5} State Implementation Plan (SIP). The work and efforts in preparing this PM₁₀ redesignation and maintenance plan will aid in the future development of the PM_{2.5} SIP.

Some of the key elements of the PM₁₀ redesignation include:

- 1) Assessing air quality trends through the use of advanced data analysis of ambient air concentrations and emission inventories.
- 2) Updating and developing a base year emission inventory and future year inventory projections. These emission inventories consist of stationary and area sources as well as on- and off-road sources.
- 3) Performing Chemical Mass Balance Receptor Model to evaluate the sources and to quantify their contributions to the pollutants measured at receptors.
- 4) Developing new control measure strategies, if necessary to ensure continued attainment of the air quality standard.
- 5) Establishing an updated Motor Vehicle Emission Budgets as required by Transportation Conformity Rules.
- 6) Preparing Environmental Documents to satisfy the requirements of California Environmental Quality Acts (CEQA).
- 7) Public outreach such as workshops and public hearings. These efforts satisfy requirements under the Federal and California Clean Air Acts.
- 8) The PM₁₀ maintenance plan and redesignation request supported by the CMAQ funding for this program is expected to will be submitted by the mid 2009.

Local Match Funding: If the PM₁₀ redesignation and maintenance plan is successful in securing this CMAQ grant, the SMAQMD will match the remaining 11.47% funds from the FY 2008-2009 budget.

Project Funding Matrix:

Project Component	Cost	Expected Funding	Expected Source of Funding*	Level of Commitment to Funding
PM ₁₀ redesignation request and Maintenance Plan	\$150,000	\$17,205	SMAQMD	Local match funds for the Air District will be included in their FY 2008 -2009 budget.
		\$132,795	SACOG Air Quality Program	
Totals	\$150,000	\$150,000		

* The Air District will approve commitments for local match funding before accepting the federal funds.

Environmental Justice: Air pollution levels in our region are not associated with political, economic or racial boundaries. Currently, the Sacramento Metropolitan Air Quality Management District is developing a comprehensive environmental justice program, where public outreach will be a core component. As part of future plan development, staff will look for additional opportunities to reach out to lower income and ethnic minority communities, including:

- Translate of key print information and documents in Spanish.
- Place public notices and legal ads in ethnic print media.
- Secure foreign language translators, either through staff or contracts with translation firms to allow more people to learn about the redesignation and maintenance plan processes.

Added Priority:

The Sacramento Region monitoring data and EPA findings show the region has met the attainment goal but has not formally redesignated the area to attainment. Without a proper redesignation, this region does not have a Motor Vehicle Emission Budgets for PM₁₀. Redesignation establishes a framework for discontinuing PM₁₀ conformity findings as provided by the CAA. In addition, without being designated as attainment, major stationary sources can only obtain offsets within Sacramento County. (CAAA Section 173(c)) A formal redesignation with a federally approved maintenance plan will ease these unnecessary restrictions and provide a clear direction for the PM₁₀ planning in the Sacramento region.

