



Adopt findings from the Reasonably Available Control Measure Analysis for Inclusion in the 8-Hour Ozone State Implementation Plan

Consent

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Attachments: Yes

Approved by: James Corless

Referring Committee: Land Use & Natural Resources

1. Issue:

Should SACOG adopt findings of the analysis of reasonably available control measures (RACM) for inclusion in the 8-Hour Ozone State Implementation Plan (SIP)?

2. Recommendation:

The Land Use and Natural Resources Committee unanimously recommends that the SACOG Board of Directors adopt the RACM findings for inclusion in the 8-Hour Ozone SIP.

3. Background/Analysis:

On October 26, 2015, the U.S. Environmental Protection Agency (EPA) strengthened the National Ambient Air Quality Standards (NAAQS) for ground-level ozone to 70 parts per billion (ppb) from 75 parts ppb. The updated NAAQS is based on extensive scientific evidence about ozone's effects on public health and welfare. The updated standards will improve public health protection, particularly for at-risk groups including children, older adults, people of all ages who have lung diseases such as asthma, and people who are active outdoors, especially outdoor workers.

Currently, the Sacramento region is designated by the U.S. EPA as in serious nonattainment for the 2015 8-hour ozone NAAQS. In the coming months, EPA will be acting upon a request from the region's air quality districts to redesignate the region to the more critical classification of severe. Concurrent with this request, the five regional air districts within the nonattainment area are jointly working together to develop a plan to demonstrate attainment of the Ozone standard by the end of 2032. As part of the plan development process outlined in the Clean Air Act, air districts in conjunction with Metropolitan Planning Organizations, are required to evaluate and consider any reasonably available control measures for point, area, off-road, and on-road source categories which can collectively advance attainment.

SACOG is specifically responsible for conducting the on-road portion of the RACM process. As part of this process SACOG looks at Transportation Control Measures (TCM); or more specifically, strategies to reduce motor vehicle trips, vehicle miles traveled, or vehicle idling and the associated air pollutant emissions for potential inclusion in the attainment demonstration. RACM implementation is necessary so attainment can be demonstrated as expeditiously as practicable. During this process, SACOG considers potential control measures that have been implemented at the federal level, in other states, and in other local air districts.

The RACM process for Transportation Control Measures includes the following steps:

1. Identify potential control measures
2. Evaluate the feasibility of potential control measures using the following factors:
 - Technological feasibility of the control measure
 - Economic feasibility of the control measure
 - If the control measure would cause substantial widespread and long-term adverse impacts
 - If the control measure is absurd, unenforceable, or impracticable
3. Determine if implementation of all transportation control measures collectively, with all other control measures for each source category (point source, non-point source, mobile source, non-mobile source), could advance attainment by at least one year.
4. The Final RACM for all sources will be completed by the regional Air Districts.

4. Discussion/Analysis:

SACOG conducted a RACM process, pulling candidate measures from several sources, including the adopted 8-Hour Ozone SIP for the 2008 Health Standard, control measures from other non-attainment California MPOs, MPOs in other states, and from the SACOG Regional Planning Partnership. The full analysis and conclusions are found in Attachment A. SACOG reviewed nearly 200 transportation related measures identified in our research and outreach. Measures were organized to align with the 16 categories specified in the Federal Clean Air Act under CAA§108(f)(1)(A). Based on this comprehensive review and analysis, all TCMs that were determined to be feasible are already being implemented or have previously been implemented in the SACOG Region. The TCMs determined to be infeasible did not meet the criteria for RACM because of the individual reasons provided in the analysis in Attachment A.

As described in the attached RACM Analysis, all feasible TCMs in SACOG region are included in our Metropolitan Transportation Plan (MTP) and Federal Transportation Improvement Program (FTIP). Thus, their emissions reductions are already included in the baseline emissions used for the air district/SIP modeling. SACOG may not claim emission reductions separately from TCMs that have already been included in the SACOG MTP and FTIP unless there are substantive changes in scope or timing.

Although no measures are found to meet RACM criteria, the SIP can contain measures that improve emissions. SACOG staff, working with the five air districts in the region, will identify any additional measures to include in the State Implementation Plan. Those measures will be brought to the SACOG board for adoption in a future committee cycle.

At the October LUNR committee meeting, staff provided an overview the SIP and RACM process, coordination efforts, and next steps. Staff from the Sacramento Metropolitan Air Quality Management District was in attendance to respond to questions from committee members. The committee recommended to forward the RACM findings for the 8-Hour Ozone SIP contained in Attachment A to the SACOG Board of Directors for adoption at the November 10th board meeting. Following this action, the RACM findings will be provided to the regional Air Districts for inclusion in the 8-Hour Ozone SIP and associated development processes.

5. Fiscal Impact/Grant Information:

There is no fiscal impact.

6. This staff report aligns with the following SACOG Work Plan Objectives:

Goal 3 : Vibrant Places