

## **Northern Sacramento Valley Attainment Plan**

As specified in the California Clean Air Act of 1988 (CCAA), Chapters 1568-1588 it is the responsibility of each air pollution control district and air quality management district within the State to attain and maintain California's ambient air quality standards. The CCAA requires that an Attainment Plan (Plan) be developed by all non-attainment districts for ozone (O<sub>3</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), and nitrogen oxides (NO<sub>x</sub>) that are either receptors or contributors of transported air pollutants. The purpose of the Plan is to comply with the requirements of the CCAA as implemented through the California Health and Safety Code (H&S Code). Districts are required to update the Plan every three years.

The Northern Sacramento Valley (NSV) is classified as a moderate nonattainment area for State 1-hour ozone standard. The NSV comprises the northern portion of the Sacramento Valley Air Basin and includes the counties of Butte, Colusa, Glenn, Tehama, Shasta and the northern portions of Yuba & Sutter (Feather River Air Quality Management District). The NSV is generally rural in nature, with a low population density and a predominately agricultural economy. Its industrial base is dominated by agricultural/construction support operations, although small scale manufacturing is also found throughout the region.

Health and Safety Code (HSC) section 41503(b) requires that control measures for the same emission sources be uniform throughout the air basin. To meet this requirement the NSV has coordinated the development of the Plan and established specific rule adoption protocols through the Technical Advisory Committee (TAC) of the Sacramento Basinwide Control Council.

The Plan was initially submitted to ARB on September 16, 1991 by the Shasta County APCD. ARB held a public hearing on the Plan on July 9, 1992 and found the Plan to conform to several elements of the CCAA, but also identified several deficiencies. ARB gave conditional approval of the Plan to allow time for completing plan modifications after consultation with the districts. The Plan includes the all feasible control measures applicable to the NSV, emission accounting and ranking of measures by cost-effectiveness, and provisions to develop area and indirect source control measures. The Plan did not fully satisfy the CCAA requirement for permitting rules and several districts did not make the cost-effectiveness findings.

After evaluating the progress achieved with the 1991 Plan, the NSV shifted the primary emphasis from the adoption of stationary source control measures to motor vehicle emission reductions. Because mobile sources are the single largest contributor to ozone pollution, the 1994 Plan concentrated on reducing these emissions through the implementation of Indirect Source Review (ISR) programs and Transportation Control Measures (TCMs). Several stationary source measures previously considered in the 1991 Plan were deemed not applicable or not offering cost-effective emission control and were removed from the list.

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The 1997 triennial update to the Plan addressed the progress made implementing the 1994 Plan and proposed modifications to the strategies necessary to attain the State ozone standard at the earliest practicable date. Like the 1994 Plan, the 1997 Plan focused on the adoption and implementation of control measures for stationary sources, mobile sources, area wide sources, indirect sources and addressed public education programs. The Plan also addressed the transport of pollutants from the upwind metropolitan areas to the NSV. With the State Implementation Plan (SIP) as the state's established control strategy for the future, the ARB found that the NSV districts would not be required to prepare a comprehensive plan update for 1997. Instead, districts were directed to focus on implementing their existing control strategies and SIP commitments.

As with the 1997 Plan, the 2000 and 2003 Plan were focused on implementing existing control strategies and SIP commitments. In the 2000, 2003 and 2006 Plan updates, districts endeavored to incorporate three general principles to guide them in their planning process: (1) Air quality modeling to identify the reductions needed and to design effective emission reduction strategies; (2) Comprehensive emission reduction programs that take advantage of current emission control technologies; and (3) Address the impacts of pollutant transport in the attainment demonstration.

Author's footnote: Due to a lack of resources and staff the NSV air districts have not completed (nor requested ARB assistance, to my knowledge) for any air quality modeling to identify the needed reductions for our unique NSV area. It should also be noted that ARB has not provided any comprehensive plan review since the initial 1991 Plan submittal.

2<sup>nd</sup> note: This Plan has been copied and pasted way too long without the above (i.e. sufficient oversight by ARB or technical assistance for modeling and emission control technologies) and should be completely overhauled!