

FEATHER RIVER AIR QUALITY MANAGEMENT DISTRICT
MEMORANDUM
02/24/2025

TO: FRAQMD BOARD OF DIRECTORS
FROM: Christopher D. Brown, AICP, APCO
SUBJECT: Informational Item on District's State Implementation Plan.

BACKGROUND:

The United States Environmental Protection Agency (US EPA) sets health based ambient air quality standards for several pollutants. These standards are known as National Ambient Air Quality Standards, or NAAQS. The NAAQS are issued for pollutants for which a level can be established to protect public health and welfare, including ground level ozone and particulate matter.

After the US EPA sets a NAAQS, the agency uses monitoring data to determine whether areas are meeting the standards. For areas not meeting the standards, the Clean Air Act requires them to submit a plan to attain the standard. For some of the NAAQS the higher the pollutant levels are above the standard, the higher the "classification" of the nonattainment area. The higher the classification, the greater amount of controls are required by the Clean Air Act. A higher classification also allows nonattainment areas additional time to meet the standard. The plan is called a State Implementation Plan, or SIP.

If a nonattainment area fails to submit the SIP by the date required in the Clean Air Act, the US EPA will issue a Finding of Failure to Submit, which starts a sanctions clock. If the SIP is not submitted within 18 months of the initiation of the sanctions clock, then stationary sources requiring offsets will be forced to purchase them at increased ratios. If the SIP is not submitted within 24 months, the area will lose federal highway funding, and the US EPA can adopt a Federal Implementation Plan (FIP) which will implement the requirements of the Clean Air Act without local input or control. Sanctions may also be triggered by a Disapproval of part of the SIP.

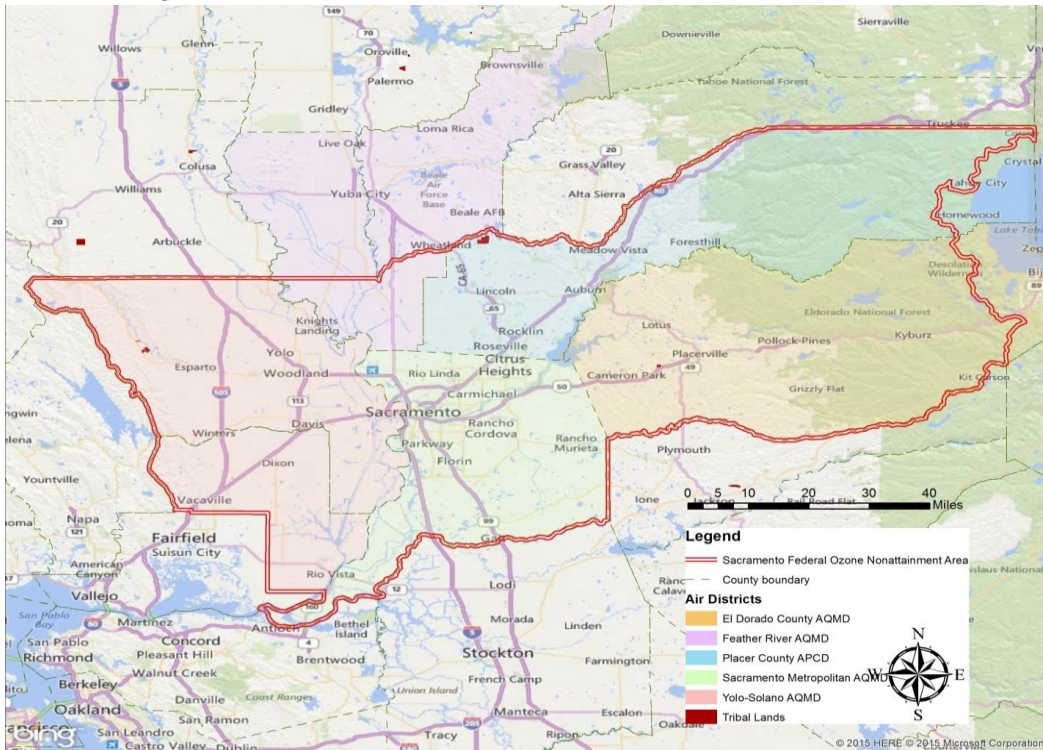
Ground Level Ozone NAAQS

One pollutant for which US EPA issues NAAQS is ground level ozone. It is formed through chemical reactions between oxides of nitrogen and reactive organic gases in the presence of sunlight. Ozone can cause health impacts on humans, including difficulty breathing, shortness of breath, damage to lung tissue and airways, and increase the risk of cardiovascular problems such as heart attacks. It can also damage vegetation. US EPA adopted the ozone NAAQS in 1979 and revised the standard in 1997, 2008, and 2015.

The southern portion of Sutter County was included in the Sacramento Federal Nonattainment Area (SFNA) for the 1997 ozone NAAQS and remained part of the SFNA for the 2008 and 2015 revisions. The

SFNA includes all of Sacramento and Yolo Counties, and portions of Sutter, Placer, El Dorado, and Solano counties, as shown in Figure 1. As part of the SFNA, the District works with these neighboring air districts, the California Air Resources Board (CARB), and the Sacramento Area Council of Governments (SACOG) to develop a SIP for the ozone NAAQS.

Figure 1: Sacramento Federal Nonattainment Area for Ozone



The SIP for the 2008 ozone NAAQS was submitted to US EPA but has one Disapproved element. On January 17, 2025, offset sanctions went into effect for the SFNA for Disapproved Contingency Measures for the 2008 ozone NAAQS. The Federal Implementation Plan and loss of federal highway funding will go into effect on July 17, 2025, unless the sanctions are turned off.

The 2008 ozone NAAQS attainment date for the SFNA was 2024 and the area met the standard by the attainment date. The region is working with CARB and US EPA to obtain a Determination of Attainment by the Attainment Date (DAAD), which would turn off sanctions. The sanctions will be turned off if US EPA approves the Contingency Measures that were submitted for its review on December 29, 2024, or issues the DAAD. The turning off of the sanctions is a critical issue for the SFNA and the District will continue to dedicate staff time and resources towards this issue through the first half of 2025.

The US EPA most recently revised the ozone NAAQS in 2015, and it was set at 70 parts per billion (ppb). The designations for the 2015 ozone standard were finalized in November 2017. The SFNA was classified as a “moderate” nonattainment area with an attainment date no later than August 2024. The SFNA air districts submitted a request to bump up to a “severe” classification with an attainment date no later than August 2033.

The SIP for the 2015 Ozone NAAQS was adopted by the SFNA air district Board of Directors and submitted to US EPA, but it has not yet been approved. The SIP elements include an Attainment Plan with modeling demonstrating the area will meet its attainment date, a Reasonable Further Progress Plan, an analysis of Reasonably Available Control Measures and whether adoption of such measures would

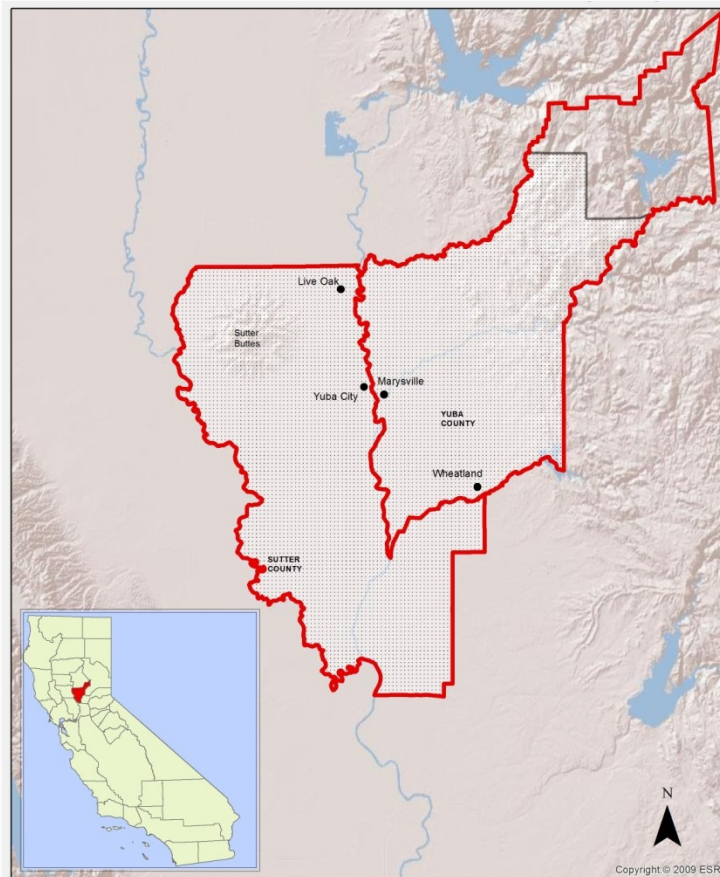
advance attainment by one year or more, contingency measures should the area fail to reach milestones or attain by its attainment date, and other elements.

Fine Particulate Matter (PM2.5) NAAQS

The Yuba City-Marysville Area was designated as nonattainment for the 2006 24-hour PM2.5 NAAQS in 2009. The area met the standard and the Board of Directors adopted a Redesignation Request and Maintenance Plan in April 2013. US EPA approved the redesignation to attainment effective January 8, 2015. As part of our redesignation to attainment, the area was required to submit a second maintenance plan 8 years after the approval of the first plan and redesignation. The second maintenance plan was adopted by the Board of Directors in April 2023 and was submitted to US EPA.

The Yuba City-Marysville PM2.5 nonattainment area includes all of Sutter County and most of Yuba County, as shown in figure 2.

Figure 2: Yuba City-Marysville Nonattainment Area for PM2.5



The US EPA revised the annual PM2.5 standard from 12.0 to 9.0 ug/m3 effective February 2024. The California Air Resources Board submitted designation recommendations based on 2021-2023 monitoring data. The Yuba City-Marysville area was recommended as nonattainment for the new annual standard. However, preliminary 2024 monitoring data shows an improvement and when the final designations are issued next February 2026 it is likely that the area will be designated as attainment based on 2022-2024 monitoring data.

FISCAL IMPACT:

The District’s staff time on federal SIPs was included in the current fiscal year’s budget.