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DEPARTMENT OF  
PLANNING AND DEVELOPMENT

CITY OF SACRAMENTO  
CALIFORNIA

March 26, 1991

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ADMINISTRATION  
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Budget and Finance/Transportation and  
Community Development Committees  
Sacramento, California

ECONOMIC DEVELOPMENT  
ROOM 300  
95814-2987  
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Honorable Members In Session:

NUISANCE ABATEMENT  
ROOM 301  
95814-3982  
916-449-5948

Subject: **STAFF COMMENTS ON THE SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT'S:  
"AIR QUALITY ATTAINMENT PLAN"**

#### SUMMARY

As a result of local, state and federal efforts and concerns, the Sacramento Metropolitan Air Quality Management District (SMAQMD) has prepared an Air Quality Attainment Plan (AQAP) which calls for the development of stringent rules and ordinances to enable SMAQMD to administer and enforce an effective air quality program. This report has been prepared jointly by the Department of Public Works and Planning and Development. It recommends that the Joint Committees offer comments to staff regarding the presentation and report by the SMAQMD. The Committees are encouraged to offer general and specific comments regarding the proposed air quality planning and permitting measures which may affect the design and timing of growth within the City.

#### BACKGROUND

The California Clean Air Act of 1988 requires areas that currently exceed state ambient air quality standards to develop new plans to attain these standards. Non-attainment areas must adopt plans designed to achieve a five percent per year emission reduction for each pollutant, retroactive to 1987 Baseline emissions.

SMAQMD has determined that the Sacramento area is in the severe stage of air pollution classification. The severe classification is based on the fact that attainment of State standards is not expected until after 1997, and that measurable levels of pollutants have yet to be confirmed by a modelling study.

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The California Clean Air Act (CCAA) requires that districts in moderate, serious and severe areas include in their attainment plans provisions to develop an indirect source control program. If a district chooses not to address indirect sources of air pollution, they must provide detailed justification for doing so. The AQAP has developed a generalized work program which includes a major effort for developing an indirect source control program.

Resolution 90-809, adopted by Council September 25, 1990, directs the Environmental Commission to take the lead responsibility for development of an indirect source control program. The program would provide an opportunity for a joint effort by the City, County and Environmental Commission to begin to develop rules that would affect land use, air quality and transportation.

The Federal Environmental Protection Agency has prepared an Advance Notice of Proposed Rulemaking for a Federal Implementation Plan (FIP) to bring the Sacramento region into attainment for ozone levels. The EPA would impose this plan if State and local agencies cannot demonstrate reasonable efforts to submit an adequate State Implementation Plan.

City staff (Planning, Environmental Services, and Transportation) have been attending various public workshops and hearings throughout the process of formulating the Air Quality Attainment Plan. Staff is preparing written comments to SMAQMD, a summary of which is discussed in the paragraphs below.

**Air Quality Board Currently Excludes Cities**

- \* The City is concerned that the SMAQMD answers to a Board which is comprised entirely of County Supervisors. Because the ISCP program will affect land use planning and decision making, consideration should be given to joint City/County composition of the Air Quality Board. The AQAP should discuss the mechanisms necessary to affect a change in the composition of the Board (i.e., would this require an amendment to the California Clean Air Act?, the Connelly bill?)

**Administration/Implementation of Specific Rules**

- \* The City is concerned that the burden of the implementation of the Plan will fall upon the City and other local agencies. The Plan should more clearly explain the roles and responsibilities of each local agency within the District and of the District itself.

- \* The City would be interested in an option in the Plan to implement and administer the Commute Alternative Rule (CAR). The City creates valuable initial contacts with developers during the Developer TMP phase of major projects and, consequently, would be able to continue monitoring Major Employers.

**Incentives/Disincentives for Local Agency Participation**

- \* The Plan will require the City and County to place stringent rules on themselves to improve air quality within the entire air basin. The Plan should outline SMAQMD's proposed method of coordinating the development of the Plan with adjacent districts within the basin. To the extent that any jurisdiction unilaterally implements a stringent measure, economic displacement would likely occur.
- \* The Plan has few real incentives to cause a local agency to pro-actively develop its own land use control measures. For example, the City is willing to commit time, money and political support to parking management measures for both the short and long terms. However, the City cannot study or implement the measures alone. The Plan should outline real incentives to cause other local agencies (within the County as well as other counties in the Basin) to follow the lead on air quality solutions.

**Need For More Specific Criteria & Thresholds**

- \* SMAQMD should develop specific criteria for the administration and implementation of the Indirect Source Control Program (ISCP). The responsibilities of each implementing agency should be defined. It is unclear whether or not the responsibility of implementation will require additional time and resources from the City. We assume there is some cost involved, but are not given enough information to make a reasonable estimate.
- \* The District should develop stringent guidelines for the development of land use control measures, as well as performance standards, needed to mitigate air quality emission impacts. Any rule developed by the District should be specific and easy to understand. In addition, the District should organize Technical Advisory Committees consisting of local agencies and interested general public.

The Plan should more clearly define and establish thresholds of development that would require approval by SMAQMD.

- \* The Plan should require the District to establish criteria for each measure to determine compliance. This would be helpful during the CEQA review of each project.
- \* Clarification is requested regarding whether roads, highways, and Capital Improvement Projects (CIP) would be subject to the ISCP. If so, will the City be subject to an air quality permit fee?

#### **Non-Attainment After 1997**

- \* The Plan notes that the attainment of State standards will not occur by 1997. The Plan states that the CCAA authorizes the ARB to approve plans that do not demonstrate attainment if every feasible control strategy or measure to ensure progress towards attainment is provided within the Plan. The Plan should clearly identify the necessity for joint agency action to aggressively pursue land use control measures, and outline the mechanisms to facilitate joint action.
- \* If the 1991 AQAP must achieve no net increase in vehicle emissions after 1997, what is the estimated reduction required per person or per vehicle in order to accommodate population growth? These will require short term, mid term and long term measures combined to achieve this goal. We should begin to consider all of the measures presently as it takes years to develop the rules and gather the political support needed to implement them.

#### **FINANCIAL DATA**

The adoption of the Plan, by itself, has no financial impact. However, the Plan envisions serious air quality improvement measures which have the potential to directly and indirectly impact the City's budget. Specific financial impacts will be identified at the time that specific rules are developed.

#### **POLICY CONSIDERATIONS**

The Joint Committees should comment, at a minimum, on items which impact land use control in the following policy areas:

1. City involvement/participation on AQMD Board of Directors;
2. City staff participation in rule making;
3. City pro-active development of indirect source control rules;
4. City implementation of land use and transportation rules.

MBE/WBE IMPACTS

There are no MBE/WBE impacts associated with this item.

RECOMMENDATION

It is recommended that the Joint Committees provide specific comments to staff regarding the 03/19/91 air quality presentation from the SMAQMD and offer comments on staff analysis contained in the present staff report.

Respectfully Submitted,




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March 26, 1990  
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