Staff Report

# ARB Review of the Portola Fine Particulate Matter ($PM_{2.5}$) Attainment Plan

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California Environmental Protection Agency
Air Resources Board

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# TABLE OF CONTENTS

## EXECUTIVE SUMMARY

This report presents the Air Resources Board (ARB) staff's assessment of the Northern Sierra Air Quality Management District (District) *"Portola Fine Particulate Matter ($PM_{2.5}$) Attainment Plan"* (Portola Plan or Plan). The District prepared the Portola Plan to address requirements under the Clean Air Act (Act) for a Moderate nonattainment area for the national annual average $PM_{2.5}$ standard of 12 micrograms per cubic meter ($\mu g/m^3$) established by the U.S. Environmental Protection Agency (U.S. EPA) in 2012.

Effective April 15, 2015, U.S. EPA designated the City of Portola (City) and surrounding areas of Plumas County (County), California as a federal Moderate nonattainment for the annual $PM_{2.5}$ standard of 12 $\mu g/m^3$. The area is officially referred to as the Plumas County $PM_{2.5}$ Nonattainment Area (Nonattainment Area). The Act establishes planning requirements for areas that exceed the annual $PM_{2.5}$ standard. These nonattainment areas must develop and implement State Implementation Plans (SIPs) that demonstrate attainment of the standard by December 2021, the Moderate area attainment date.

The Nonattainment Area, located in an intermountain basin in the Sierra Nevada Mountains, experiences elevated $PM_{2.5}$ concentrations during the winter months when temperatures are low and the area's topography combined with strong meteorological inversions limit pollutant dispersion. The largest source of emission during the winter months is wood stoves, which are the primary source of heat for many residents due to the lack of natural gas service and high cost of propane and electricity. These elevated wintertime $PM_{2.5}$ levels lead to violations of the annual standard.

The Portola Plan, developed by the District in accordance with U.S. EPA guidance, includes elements required in a Moderate area SIP, including comprehensive emission inventories for directly emitted $PM_{2.5}$ and all $PM_{2.5}$ precursors; an attainment demonstration; a reasonable further progress (RFP) demonstration and quantitative milestones; an assessment of reasonably available control measures (RACM) and technologies (RACT) plus additional reasonable measures; motor vehicle transportation conformity budgets reflecting the latest planning assumptions; and identification of contingency measures if the Nonattainment Area fails to meet RFP milestones. The strategy in the Portola Plan for reducing emissions relies primarily on an incentive program that replaces uncertified, inefficient wood stoves with certified, high efficiency devices. The Portola Plan demonstrates that the emission reductions resulting from the wood stove replacement program are real, enforceable, quantifiable, surplus, and permanent as required by U.S. EPA guidance.

The District Governing Board adopted the Portola Plan on January 23, 2017. ARB staff has reviewed the Portola Plan and determined that the plan addresses the Act planning requirements and provides for attainment of the annual standard by December 2021. Staff recommends that the Board approve the Northern Sierra Air Quality Management District Attainment Plan as a revision to the California SIP.

## I. BACKGROUND

Exposure to $PM_{2.5}$ is associated with increased risk of hospitalization for lung and heart-related illnesses and premature mortality, especially in children, the elderly, and people with existing health problems. The Act requires U.S. EPA to establish national ambient air quality standards to protect public health and regularly update them to reflect new health information. U.S. EPA first established a $PM_{2.5}$ standard in 1997, consisting of a 24-hour $PM_{2.5}$ standard of 65 $\mu g/m^3$ and an annual standard of 15 $\mu g/m^3$. Based on an extensive assessment and scientific review of the health impacts of $PM_{2.5}$ pollution, U.S. EPA strengthened the 24-hour $PM_{2.5}$ standard to 35 $\mu g/m^3$ in 2006, and the annual standard to 12 $\mu g/m^3$ in 2012.

Under subpart 4 of the Act, each nonattainment area begins with a Moderate classification and is required to submit a SIP within 18 months to evaluate whether the standard can be met within six years of the initial designation. If attainment within six years cannot be demonstrated, U.S. EPA classifies the area as Serious and establishes requirements for a second SIP submittal that must show attainment within 10 years. To provide further guidance on the SIP requirements, U.S. EPA promulgated the 2016 Fine Particulate Matter National Ambient Air Quality Standard State Implementation Plan Requirements Rule (Implementation Rule).[1]

The City of Portola and surrounding areas of Plumas County were designated as a Moderate nonattainment area in April 2015. The District has developed the Portola Plan to meet the annual standard by the Moderate area deadline and protect the health of the residents in the Nonattainment Area. The Portola Plan addresses requirements under the Act for a Moderate area consistent with the Implementation Rule.

## II. NATURE OF THE $PM_{2.5}$ PROBLEM IN THE PLUMAS COUNTY $PM_{2.5}$ NONATTAINMENT AREA

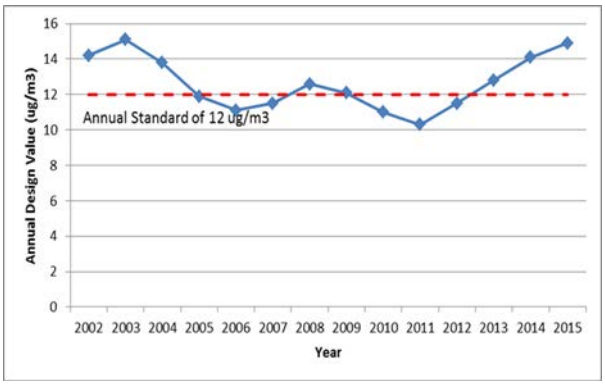
$PM_{2.5}$ is a complex mixture of many different species generated from a wide array of emission sources. $PM_{2.5}$ may be emitted directly into the air in the form of soot, smoke, or dust, or can be formed in the atmosphere as secondary particles from the reactions of precursor gases, including nitrous oxides (NOx), sulfur oxides (SOx), reactive organic gases (ROG), and ammonia. The relative mixture of these constituents in a region drives the nature of the needed control strategy.

The Plumas County $PM_{2.5}$ Nonattainment Area includes the City of Portola and the nearby communities of Iron Horse, Delleker, C-Road, Mohawk Vista, Plumas-Eureka, Blairsden-Graeagle, Gold Mountain, Whitehawk, Clio, Johnsville, and portions of Lake Davis. The Nonattainment Area is located in an intermountain basin isolated by rugged mountains, which affects the climate of Portola and surrounding communities. The area's topography, combined with the inversion-prone meteorology of the region, restricts airflow and favors the accumulation of pollutants.

[1] 81 FR 58010 https://www.gpo.gov/fdsys/pkg/FR-2016-08-24/pdf/2016-18768.pdf

Figure 1 below illustrates the annual average design value measurement at Portola between 2002 and 2015. The design value is the metric used for assessing compliance with the annual standard and represents the average of three consecutive annual average concentrations. Over this period, annual $PM_{2.5}$ design values in the Nonattainment Area ranged from 10.3 µg/$m^3$ to 14.9 µg/$m^3$. While there is no overall trend, there is a substantial amount of year to year variability which is primarily driven by annual variations in meteorological conditions. Low temperatures, limited precipitation, and meteorological inversions allow $PM_{2.5}$ to accumulate, leading to higher concentrations.

Figure 1. Trends in annual average PM2.5 design value at Portola




To understand the nature of $PM_{2.5}$ in the nonattainment area and identify contributing sources, ARB and District staff conducted a number of analyses. These included examining seasonal and diurnal patterns, and the chemical composition of $PM_{2.5}$. Figure 2 shows the seasonal pattern of FRM $PM_{2.5}$ concentrations. The highest concentrations occur during the winter months, with the highest levels between November and February. ARB staff analyzed the hourly data for these four winter months as shown in Figure 3. The hourly pattern indicates strong diurnal variability, with the highest concentrations during the nighttime. Figure 4 shows the $PM_{2.5}$ annual chemical composition. Carbonaceous aerosols, including organic matter and elemental carbon, are responsible for 88 percent of $PM_{2.5}$ mass. On days over the 35 µg/$m^3$ 24-hour standard, the carbonaceous aerosols contribution increases to 94 percent. Elevated wintertime concentrations that occur predominantly during evening hours and consist largely of carbonaceous particles are all indicative of wood burning as an emissions source.

Figure 2. 2013-2015 Monthly average $PM_{2.5}$ levels

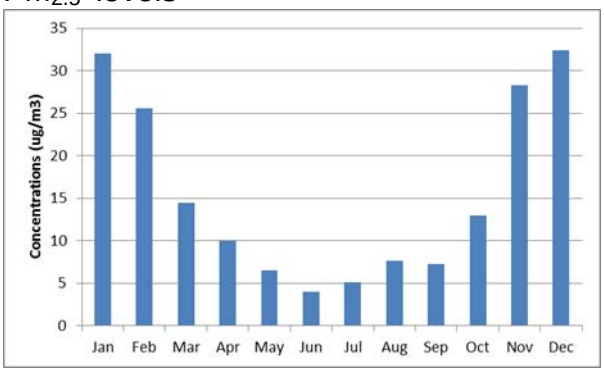



Figure 3. 2013-2015 Average diurnal pattern during winter (Nov-Feb)

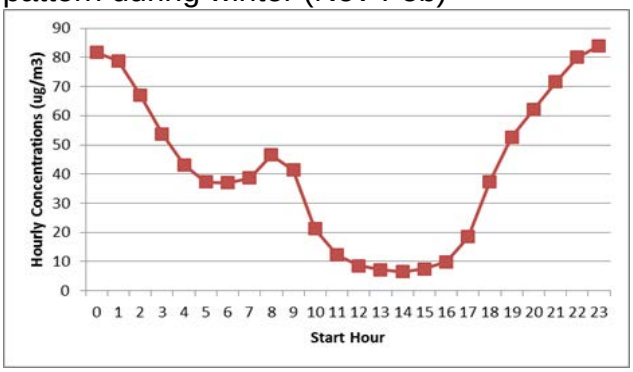
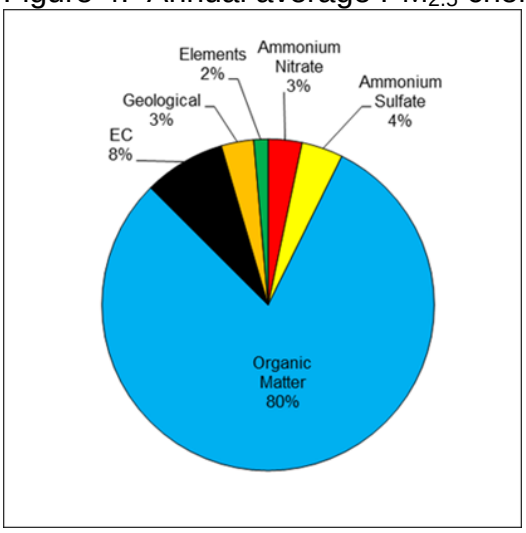



Figure 4. Annual average $PM_{2.5}$ chemical composition




To provide further source identification, staff conducted positive matrix factorization (PMF) modeling. Using chemical composition data, PMF identifies potential sources of $PM_{2.5}$. Figure 5 illustrates the results of the PMF modeling. Wood burning was identified as a major source of $PM_{2.5}$, contributing 76 percent of the mass annually. On days over 35 $\mu g/m^3$, that contribution increased to 86 percent. Finally, levoglucosan, a molecular marker of wood smoke, is also measured at the Portola monitor. Figure 6 shows that elevated $PM_{2.5}$ concentrations and levoglucosan are highly correlated indicating that wood burning is likely the source of the elevated levels.

Figure 5. Annual average $PM_{2.5}$ source contribution

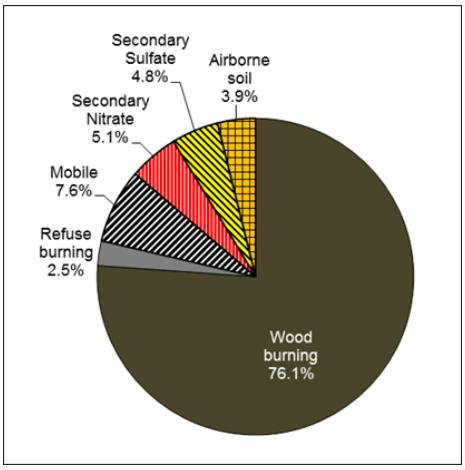
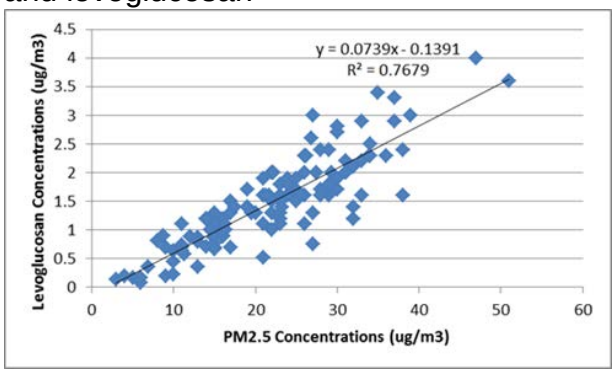



Figure 6. Correlation between $PM_{2.5}$ mass and levoglucosan




About 16 percent of the Nonattainment Area residents have household incomes less than $15,000 and close to 50 percent have incomes below $35,000.[2] Because natural gas is not available in the area and use of propane and electricity is costly, wood burning is the primary source of home heating for many residents.

## III. CLEAN AIR ACT REQUIREMENTS

The applicable attainment planning requirements under subpart 4 (section 189(a) and (b)) depend on whether the nonattainment area is classified as Moderate or Serious. Initially all nonattainment areas are classified as Moderate; therefore, staff evaluated the Portola Plan pursuant to the Moderate requirements of subpart 4. The Act requires SIPs for Moderate $PM_{2.5}$ areas to address the following elements.

- Base year emission inventories and future year forecasts for manmade sources of directly emitted $PM_{2.5}$ and $PM_{2.5}$ precursors;
- Precursor demonstration;
- Attainment demonstration;
- Demonstration that control measures meet RACM, RACT, and additional reasonable measures level;
- Requirements for RFP;
- Contingency measures for RFP and attainment;
- Quantitative milestones; and,
- Transportation conformity emission budgets to ensure transportation projects are consistent with the SIP.

[2] Source: U.S. Census 2009-2013 American Community Survey 5-year estimates

## A. Emission Inventory

$PM_{2.5}$ SIPs must contain base year inventories of directly emitted $PM_{2.5}$, NOx, SOx, ROG and ammonia, as well as future year forecasts. An emission inventory consists of a systematic listing of sources of air pollutants with an estimate of the amount of pollutant emissions from each source category over a period of time.

ARB and District staff worked jointly to prepare an updated annual average emission inventory for the Portola Plan. The base year inventory is 2013, one of the years used in designating Portola as nonattainment for the 12 $\mu g/m^3$ standard as specified in the Implementation Rule. The inventory includes a category-by-category review and update using the most recent information available on emissions-generating activities and anticipated population and economic growth in the region. The sources of directly emitted $PM_{2.5}$ during winter, the primary contributor to measured $PM_{2.5}$ levels, are summarized in Table 1. Wood burning emissions from home heating devices constitute about 90 percent of the $PM_{2.5}$ winter inventory. Additional information on the emission inventory methodologies and resulting base and future year emissions can be found in Section III and Appendix B of the Portola Plan.

Table 1. 2013 average PM2.5 emissions during winter

| Category | 2013 Emissions (tpd) |
|---|---|
| Residential Fuel Combustion | 0.604 |
| Managed Burning and Disposal | 0.009 |
| Cooking | 0.009 |
| Dust | 0.031 |
| Mobile Sources | 0.017 |
| Stationary Sources | 0.007 |
| Total $PM_{2.5}$ | 0.676 |

## B. Attainment Demonstration

Section 189(a)(1)(B) of the Act requires that a Moderate area nonattainment plan contain either a demonstration that the plan will provide for attainment by the applicable attainment date. In the attainment demonstration section of the Portola Plan, the District described how the chosen control strategies provide the emission reductions needed to bring the area into attainment by the Moderate attainment date, December 2021.

As discussed in Section II, the Nonattainment Area experiences elevated $PM_{2.5}$ concentrations during winter months when stagnant air conditions are coupled with increased demand for home heating. Residential wood burning is the dominant cause of elevated $PM_{2.5}$ concentrations, and thus the key source to control for attainment of

the annual standard. The District conducted a heating survey which revealed that about 70 percent of homes in the area were built before U.S. EPA certified stoves became available on the market and over 50 percent of those surveyed reported having an uncertified stove. Today's U.S. EPA certified wood stoves are over 60 percent cleaner than an uncertified model. Portola's strategy therefore focused on providing financial incentives for homeowners to replace high polluting uncertified stoves with cleaner burning certified devices.

The District received approximately $2.5 million for an incentive based wood stove change-out program from a U.S. EPA 2015 Targeted Air Shed Grant. This money will be used to change out 600 stoves between 2016 and 2020. The change-out program was paired with a City of Portola wood burning ordinance (Ordinance 344) which laid the foundation for a long-term community wood smoke reduction strategy. The removal and destruction of the old stoves assures that the emission reductions are permanent and the change-outs are enforceable, with the City of Portola Ordinance 344 prohibiting the installation of uncertified stoves in the future. The 600 uncertified stoves that are projected to be changed-out by the end of 2020 were estimated to provide 93 percent of the reductions needed for attainment. The remaining 7 percent would be achieved from the on-going implementation of ARB's motor vehicle control program.

The District also included additional control measures that were not relied upon in the attainment demonstration but are important elements of a long-term community wood smoke reduction strategy to continue to reduce public exposure. Starting on January 2021, the District will implement a mandatory burning curtailment program. Under this program, when $PM_{2.5}$ levels are forecasted to exceed 30 $\mu g/m^3$, the operation of uncertified stoves will be prohibited. This measure was designed to encourage the owners of uncertified stoves to participate in the change-out program. The District also developed programs to enhance education, outreach, and public awareness to support the implementation of the wood stove change-out program by ensuring proper wood burning, wood storage, and home heating device maintenance. Section IV of the Portola Plan includes a detailed evaluation of the control strategies and their roles in attaining the annual standard.

All attainment demonstrations must project air quality below the standard using approved modeling techniques. U.S. EPA guidance recommends the use of multiple year averages of design values, where appropriate, to dampen the effects of single year anomalies in the air quality trend due to factors such as adverse or favorable meteorology or radical changes in the local emissions profile. The drought conditions that have persisted in California over the past few years have negatively affected air quality in the area. To present a more balanced scenario, ARB has utilized a five-year weighted average design value as the starting point for demonstrating attainment.

For modeling attainment in the Nonattainment Area, the District and ARB used both a traditional rollback model and an alternative rollback model as the basis for projecting future design values and the effect of control strategies. In both modeling approaches, the control strategies included in the attainment plan were projected to provide direct

$PM_{2.5}$ air quality benefits of 1.87 µg/$m^3$, resulting in a 2021 modeled value of 12 µg/$m^3$ and demonstrating attainment by the Moderate area attainment deadline.

### C. Precursor Demonstration

The purpose of the $PM_{2.5}$ precursor demonstration is to focus regulatory efforts on the appropriate $PM_{2.5}$ precursors for expeditious attainment of the standard. Any precursor that does not significantly contribute to the $PM_{2.5}$ concentrations in the area or is not needed for expeditious attainment does not need to be addressed in meeting Act requirements, such as RACM, RFP, and contingency measures. To evaluate the significance of reducing emissions from the different $PM_{2.5}$ precursors on the future modeled $PM_{2.5}$ design values, ARB staff followed the comprehensive precursor analysis option provided for in the Implementation Rule. ARB staff collaborated with the District on this analysis, as well as consulted with U.S. EPA staff. As shown in Figure 5, $PM_{2.5}$ concentrations in Portola are dominated by primary $PM_{2.5}$. Ammonium nitrate and ammonium sulfate, which are formed from gaseous precursors, comprise less than ten percent of measured concentrations. The comprehensive analysis of emissions, precursor contribution, and sensitivity-based contributions, presented in Section V.C. of the Portola Plan, demonstrates that gaseous precursors were not significant per the precursor guidance criteria. Therefore, the Portola Plan needs to address only directly emitted $PM_{2.5}$.

### D. Incentive Measure and Enforceable Commitment

U.S. EPA has developed guidance for using emission reductions from incentive measures to meet Act requirements. In order to receive SIP approval, the emission reductions achieved by implementing an incentive measure must meet criteria established by U.S. EPA. The state must demonstrate that the emission reductions meet integrity elements that the reductions are real, surplus, enforceable, and quantifiable.

The District followed U.S. EPA guidelines to demonstrate that the emission reductions from the wood stove change-out program meet the integrity element by satisfying the following criteria:

- Enforceable “backstop” commitment to monitor emission reductions and rectify shortfalls;
- Technical analysis on how the reductions are relied upon for RFP and attainment;
- Demonstration that the District has the authority, resources and funding to implement the emission reductions;
- Procedures for public disclosure of information; and
- Provisions to measure and track results.

Details regarding each of these elements are included in Appendix E of the Portola Plan. The District also developed guidelines to implement the wood stove change-out program. The guidelines are included in Appendix F and the U.S. EPA 2015 Targeted Air Shed Grant work plan is included in Appendix G of the Portola Plan.

ARB staff has concluded that the Portola Plan demonstrates that the emission reductions from the wood stove change-out program are real, enforceable, quantifiable, surplus, and permanent as required by U.S. EPA guidance.

## E. Reasonably Available Control Measures and Additional Reasonable Measures Demonstration

As specified in the Act, SIPs must provide for the implementation of RACM, including measures that qualify as Reasonably Available Control Technologies (RACT) for $PM_{2.5}$ and $PM_{2.5}$ precursors within four years after designation. The Implementation Rule also requires implementation of additional reasonable measures between four and six years after designation. Collectively, these requirements ensure that appropriate controls are in place within the six year timeframe of a Moderate nonattainment area. U.S. EPA interprets RACM as those emission control measures that are technologically and economically feasible and when considered in aggregate, would advance the attainment date by at least one year. The Portola Plan contains a RACM/RACT and additional reasonable measures demonstration for sources under the jurisdiction of State, District, and metropolitan transportation agencies for $PM_{2.5}$ emissions. As discussed in Section III.B, only directly emitted $PM_{2.5}$ was considered significant under U.S. EPA guidance (Chapter IV.D of the Portola Plan). Chapter VI.D of the Portola Plan also demonstrates that there were no additional reasonable measures that could be implemented between four and six years after designation. The Portola Plan also includes a demonstration that California's mobile source control programs fully meet the requirements for RACM.

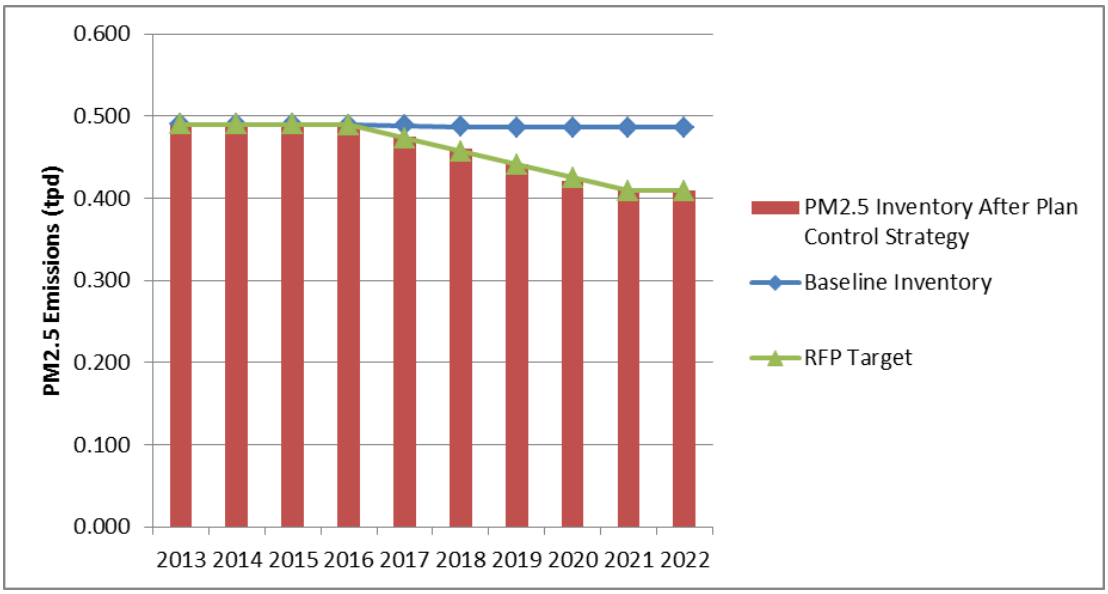
ARB staff concluded that Portola Plan analysis sufficiently evaluated the relevant sources and controls and adopted reasonably available control measures consistent with the Act requirements, as well the Implementation Rule.

## F. Reasonable Further Progress

The purpose of the RFP demonstration is to ensure that a nonattainment area makes steady progress towards attainment. RFP milestones are set in three year increments beginning in 2016. For the Portola Plan, the RFP milestone years are therefore 2019 and 2022. Consistent with the Implementation Rule, the RFP demonstration in the Portola Plan includes control measure implementation schedules for all District and ARB measures identified as RACM/RACT and additional reasonable measures; projected RFP emissions for the 2019 and 2022 milestone years for $PM_{2.5}$; and a demonstration that the schedule of aggregate emission reductions achieves sufficient progress.

Between 2016 and 2020, the District plans to change-out between 100 and 150 stoves per year. This phased-in schedule will ensure generally linear progress towards attainment meeting the requirement of the Act (Figure 7). Section VI.A of the Portola Plan includes a detailed RFP analysis.

Figure 7. Baseline inventory, inventory after plan control strategy, and RFP Target




ARB staff determined that Portola Plan RFP satisfies the RFP requirements as outlined in the Implementation Rule.

## G. Quantitative Milestones

The Act also requires $PM_{2.5}$ SIPs to include quantitative milestones that link actions in the control strategy to the emission levels established for the RFP milestone years of 2019 and 2022. Chapter VI.A of the Portola Plan describes these milestones. The milestones focus on the implementation of the wood stove change-out program. The Nonattainment Area is expected to reduce emissions of directly emitted $PM_{2.5}$ by 0.045 tpd by 2019 and 0.77 tpd by 2022. The District and ARB are committed to implementing the wood stove change-out program and continuing the ongoing reductions in the mobile sector in order to achieve milestone and attainment obligations.

In the Portola Plan, the District committed to tracking, quantifying, and reporting to U.S. EPA progress toward attainment, and adherence to milestone obligations, 90 days after a given milestone (in January 2020 and January 2023). The first report, due January 2020, will include a report on whether RACM/RACT controls have been fully implemented within four years of designation.

The Portola Plan satisfied the quantitative milestone requirements for quantifying reductions at each milestone year and reporting progress towards attainment.

## H. Contingency Measures

The Act requires that SIPs contain contingency measures for both RFP and attainment. Contingency measures must represent additional reductions not accounted for in setting RFP levels. U.S. EPA has interpreted the contingency requirement to represent one year's worth of emission reductions. These measures must take effect without further rulemaking action. The District developed contingency measures for the 2019 and 2022 milestone years in accordance with the requirement in section 172(c)(9) of subpart 1 of the Act. In order to provide sufficient emission reductions for the milestone year, 2019, the District will adopt a policy or ordinance committing the District to review progress towards meeting RFP goals and attaining the standard by December 2021. The District will adopt this policy/ordinance by December 31, 2017 and review the progress by October 31, 2018. If upon the review, the District determines that the emission reductions are short of projections and the District may not meet the 2019 RFP target, the District will limit the replacement appliances to pellet stoves, propane stoves, and wood stoves that currently exceed U.S. EPA Step 2 emission limits that will be required in 2020. Limiting the replacement appliance to the cleanest ones available on the market was projected to reduce the emissions by over one year of RFP reductions.

The attainment year contingency will be satisfied by the reductions achieved from implementation of a mandatory burning curtailment program. Starting on January 1, 2021, the District will implement a mandatory burning curtailment program. If meteorological dispersion is limited, and $PM_{2.5}$ has a potential to exceed 30 $\mu g/m^3$, the District will call a 'No Burn Day'. On a 'No Burn Day' wood burning will be prohibited unless a certified stove is utilized. Using historical data, the District estimated the number of days per year that could be subject to a 'No Burn Day' restriction, and, for the purpose of calculating the contingency, assumed that the last 200 stoves are not changed-out as planned. The number of uncertified stoves along with the number of days subject to 'No Burn Day' restrictions was used to estimate attainment year contingency. The mandatory burning curtailment was adopted as part of the City of Portola Ordinance 344 and will automatically take place without any further action by the District. Implementation of the mandatory wood burning curtailment was projected to reduce the future year design value by more than one year of RFP reductions expected for contingency measures.

Section VI.B of the Portola Plan describes the contingency measures in detail. ARB staff determined that Portola Plan contingency measures satisfy the Act requirements for contingencies.

## I. Transportation Conformity Budgets

Under section 176(c) of the Act, transportation plans, programs, and projects that receive federal funding or approval must be fully consistent with the SIP before being

approved by a metropolitan planning organizations (MPO). U.S. EPA's transportation conformity rule[3] details requirements for establishing motor vehicle emission budgets (budgets) in SIPs for the purpose of ensuring the conformity of transportation plans and programs with the SIP.

An analysis of precursors and their influence for transportation conformity in the Nonattainment Area concludes that ROG, SOx, NOx, paved and unpaved road dust, road construction dust and ammonia are insignificant precursors in the Nonattainment Area and, therefore, the Portola Plan does not establish budgets for these pollutants. For directly emitted $PM_{2.5}$ from on road exhaust and tire and brake wear, the analysis concludes that although their contributions are very small, the control of this precursor is necessary to demonstrate attainment. Therefore, this plan establishes motor vehicle emission budgets for primary emissions of $PM_{2.5}$ from vehicle exhaust and tire and brake wear.

The emission budgets established in the Portola Plan fulfill the requirements of the Act and U.S. EPA regulations to ensure that transportation projects will not interfere with progress and attainment of the annual $PM_{2.5}$ standard.

## IV. ENVIRONMENTAL IMPACTS

The District found that the Portola Plan will not result in any potentially significant adverse effects on the environment and is exempt from the provisions of the California Environmental Quality Act (CEQA) under section 15061 (b)(3) (the general rule that CEQA only applies to projects which have the potential for causing a significant effect on the environment) and section 15308 (actions taken by a regulatory agency for protection of the environment) of the CEQA Guidelines.

ARB has determined that its review and approval of the Portola Plan submitted by the District for inclusion in the California SIP does not alter the conclusion that the Portola Plan is exempt from CEQA. Generally, ARB considers its review and approval of district plans for inclusion in the California SIP as a ministerial activity by ARB for purposes of CEQA (14 CCR § 15268). A "ministerial" decision is one that involves fixed standards or objective measurements where the agency has no discretion to shape the activity in response to environmental concerns. (14 CCR § 15369; *San Diego Navy Broadway Complex Coalition v. City of San Diego* (2010) 185 Cal.App.4th 924, 934.)

[3] Federal transportation conformity regulations are found in 40 CFR Part 51, subpart T – Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Developed, Funded or Approved Under Title 23 U.S.C. of the Federal Transit Laws. Part 93, subpart A of this chapter was revised by the EPA in the August 15, 1997 Federal Register.

## V. STAFF RECOMMENDATION

ARB staff recommends that the Board:

1. Approve the Northern Sierra Air Quality Management District Portola Plan as a revision to the California SIP.

2. Direct the Executive Officer to submit the Portola Plan for U.S. EPA approval.