

Staff Report

CARB Review of the South Coast 2021 PM2.5 Redesignation Request and Maintenance Plan

Release Date: October 29, 2021

Hearing Date: December 9, 2021



This page intentionally left blank.

CARB staff has prepared a written report reviewing the South Coast Air Quality Management District Plan. Copies of the report may be obtained from CARB's website at <https://ww2.arb.ca.gov/our-work/programs/california-state-implementation-plans/nonattainment-area-plans/south-coast-air>, on October 29, 2021. However, because of current travel, facility, and staffing restrictions, CARB's office may have limited access. Please contact Chris Hopkins, Regulations Coordinator, at chris.hopkins@arb.ca.gov or (916) 445-9564 if you need physical copies of the documents.

For individuals with sensory disabilities, this document is available in Braille, large print, audiocassette, or compact disc. Please contact CARB's Disability Coordinator at (916) 323-4916 by voice or through the California Relay Services at 711 to place your request for disability services. If you are a person with limited English and would like to request interpreter services, please contact CARB's Bilingual Manager at (916) 323-7053.

This document has been prepared by the staff of the California Air Resources Board. Publication does not signify that the contents reflect the views and policies of the California Air Resources Board, nor do trade names or commercial products constitute endorsement or recommendation for use.

For questions, please contact:

Scott King, Ph.D.
Air Pollution Specialist
South Coast Air Quality Planning Section
California Air Resources Board
Phone: (916) 322-2832
Email: scott.king@arb.ca.gov

Or

Ariel Fideldy
Manager
South Coast Air Quality Planning Section
California Air Resources Board
Phone: (279) 208-7225
Email: ariel.fideldy@arb.ca.gov

Table of Contents

Executive Summary	1
Background	2
Clean Air Act Redesignation Requirements	4
Evaluation of the 2021 PM2.5 Redesignation Request	5
South Coast met the 24-hour PM2.5 standards	5
U.S. EPA has approved 24-hour PM2.5 SIPs	5
Attainment of the 24-hour PM2.5 standards was due to permanent and enforceable reductions in emissions.....	5
A maintenance plan is included meeting the requirements of section 175(A) of the Act.....	6
Attainment Emission Inventory	7
Maintenance Demonstration.....	7
PM2.5 Monitoring Network	8
Verification of Continued Attainment	9
Contingency Plan	9
Transportation Conformity.....	10
California Environmental Quality Act	11
Conclusion and Staff Recommendations.....	12

Executive Summary

The federal Clean Air Act (Act) establishes planning requirements for areas that exceed the health-based national ambient air quality standards (standards). These areas, known as nonattainment areas, must develop and implement a State Implementation Plan (SIP) that demonstrates how they will attain the standard by specified dates. In 1997, the United States Environmental Protection Agency (U.S. EPA) adopted the 24-hour fine particulate matter (PM_{2.5}) standard of 65 micrograms per cubic meter (µg/m³); this standard was lowered to a more health-protective level of 35 µg/m³ in 2006. The South Coast Air Basin (South Coast) is designated nonattainment for both the 65 and 35 µg/m³ 24-hour PM_{2.5} standards.

The South Coast Air Quality Management District (District) adopted the South Coast's first 24-hour PM_{2.5} attainment plan for the 65 µg/m³ standard in 2007 as part of the South Coast Air Quality Management Plan (2007 AQMP). On January 9, 2012, U.S. EPA approved the attainment demonstration for the 65 µg/m³ 24-hour PM_{2.5} standard included in the 2007 AQMP. And on August 24, 2016, the U.S. EPA determined that air quality in the South Coast attained the 65 µg/m³ PM_{2.5} standard.

Subsequent AQMPs in 2012 and 2016 addressed the 35 µg/m³ 24-hour PM_{2.5} standard, further refining the 24-hour PM_{2.5} attainment strategy in the South Coast resulting in significant reductions of PM_{2.5} and its precursors. The 2016 AQMP demonstrated the South Coast would attain the 35 µg/m³ 24-hour PM_{2.5} standard by December 31, 2019. While the South Coast did not attain the 35 µg/m³ 24-hour PM_{2.5} standards in 2019, monitored data in 2020 demonstrated that the South Coast met the 24-hour PM_{2.5} standards.

In order to request the South Coast be redesignated to attainment for the 24-hour PM_{2.5} standards, the District developed the *2021 Redesignation Request and Maintenance Plan for the 2006 and 1997 24-Hour PM_{2.5} Standards for South Coast Air Basin*¹ (2021 PM_{2.5} Redesignation Request). The 2021 PM_{2.5} Redesignation Request demonstrates that the South Coast meets the requirements of the Act to allow U.S. EPA to redesignate the South Coast to attainment for the 65 µg/m³ and 35 µg/m³ 24-hour PM_{2.5} standards (24-hour standards).

Section 107(d)(3)(E) of the Act list the requirements for an area to be redesignated to attainment. The requirements include that U.S. EPA has determined that the standard has been attained, that the applicable SIP demonstrating attainment of the standard has been fully approved by U.S. EPA under section 110(k), that the improvement in air quality is due to permanent and enforceable reductions in emissions, and that the state has submitted a maintenance plan for the standard that meets the requirements of Section 175(A) of the Act.

On November 5, 2021, the District will consider approval of the 2021 Redesignation Request. CARB staff has reviewed the 2021 Redesignation Request and if approved by the District

¹ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/draft-final-pm2-5-redesignation-request-and-maintenance-plan.pdf?sfvrsn=8>

concludes that it meets the requirements of section 107(d)(3)(E) of the Act for redesignation of the South Coast to attainment for both the 24-hour standards.

Background

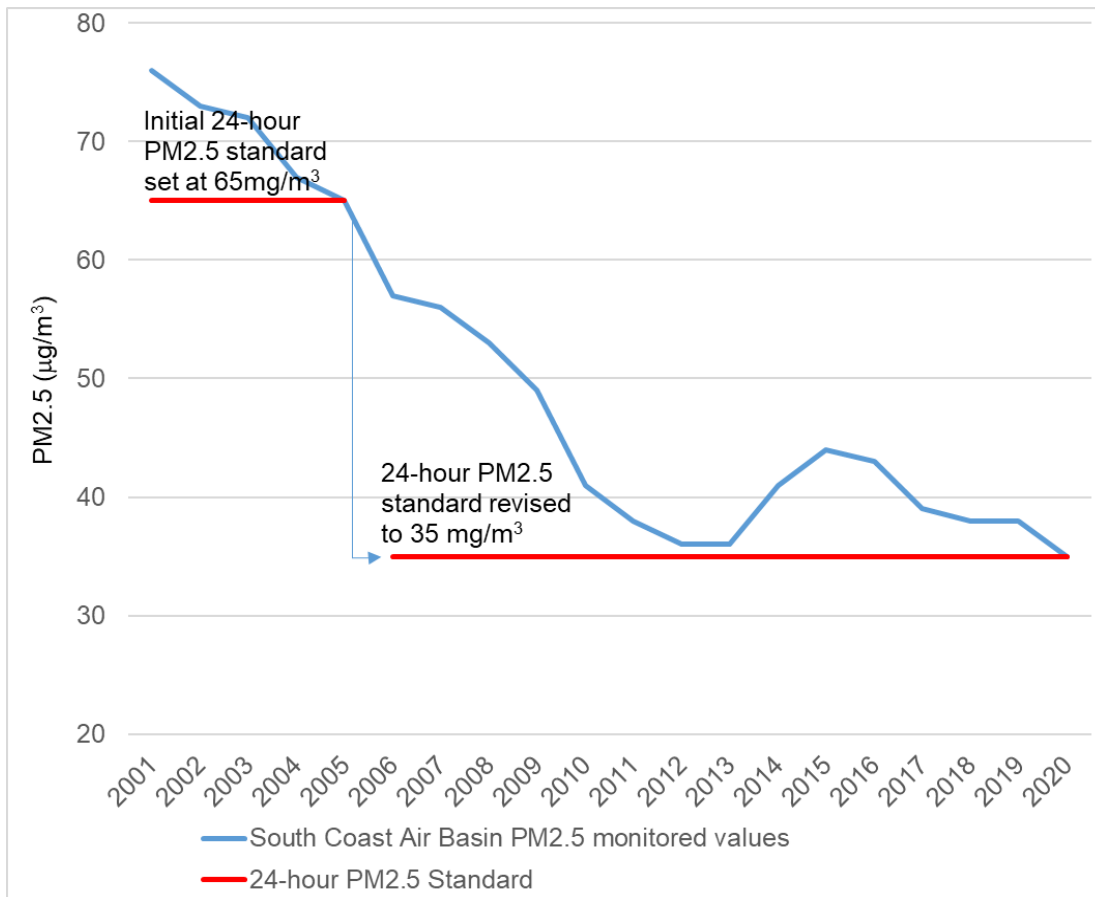
On July 18, 1997, U.S. EPA established the first health-based 24-hour PM_{2.5} standard² of 65 µg/m³ (65 µg/m³ PM_{2.5} standard). The 65 µg/m³ PM_{2.5} standard is based on a 3-year average of the highest 98th percentile value of the year's 24-hour concentrations. In 2005, the South Coast was designated as nonattainment for the 65 µg/m³ PM_{2.5} standard and given an attainment date of April 5, 2015.

On December 18, 2006, U.S. EPA lowered the level of the 24-hour PM_{2.5} standard from 65 µg/m³ to 35 µg/m³ (35 µg/m³ PM_{2.5} standard). The South Coast was designated nonattainment for the 35 µg/m³ PM_{2.5} standard in 2009 and eventually classified as a serious area for the 35 µg/m³ PM_{2.5} standard under section 188 of the Act. As an area classified as serious for the 35 µg/m³ PM_{2.5} standard, the South Coast was given an attainment date of December 31, 2019.

Over the past two decades, 24-hour PM_{2.5} levels and the number of exceedance days of the 65 µg/m³ PM_{2.5} standard have decreased dramatically. While the South Coast 24-hour PM_{2.5} levels were well above the 65 µg/m³ standard in the early 2000s when monitoring of the standard began, 24-hour PM_{2.5} levels were quickly reduced due to State and District measures such that, by 2005, monitored 24-hour PM_{2.5} levels in the South Coast were well below the 65 µg/m³ standard (Figure 1).

² <https://www.govinfo.gov/content/pkg/FR-1997-07-18/pdf/97-18577.pdf>

Figure 1: 24-hour PM2.5 design values in the South Coast from 2001 to 2020



On August 24, 2016, based on 2011 to 2013 monitored data, the U.S. EPA determined that the South Coast attained the 65 µg/m³ PM_{2.5} standard³. This U.S. EPA action did not constitute a redesignation of the South Coast to attainment for the 65 µg/m³ PM_{2.5} standard under section 107(d)(3) of the Act since the District had yet to submit the other requirements for redesignation such as a maintenance plan. Therefore, while certain planning requirements for the 65 µg/m³ PM_{2.5} standard are no longer required to be submitted so long as the South Coast continues to meet the 65 µg/m³ PM_{2.5} standard, the South Coast remains nonattainment until U.S. EPA determines that California has met the requirements for redesignating the South Coast to attainment.

While monitored levels of 24-hour PM_{2.5} in South Coast have remained below the 65 µg/m³ PM_{2.5} standard since 2005, 24-hour PM_{2.5} levels did increase slightly from 2013 to 2015 due, in large part, to the extreme drought conditions in Southern California and the associated lack of rain and dispersion normally associated with winter weather⁴.

³<https://www.federalregister.gov/documents/2016/07/25/2016-17410/clean-data-determination-for-1997-pm25>

⁴<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/2015-supplement-pmsip.pdf>.

After 2015, 24-hour PM_{2.5} levels returned to the previous downward trend. And although the South Coast did not attain the 35 µg/m³ PM_{2.5} standard by the December 31, 2019 attainment deadline, 2018 and 2019 98th percentile levels were below the 24-hour PM_{2.5} standards at all sites. In 2020, after removing days for which exceptional event demonstrations are being submitted later this year, the South Coast met the 35 µg/m³ PM_{2.5} standard.

Clean Air Act Redesignation Requirements

To redesignate an area to attainment for the standard, section 107(d)(3)(E) of the Act requires that specific criteria are met. The criteria required to be demonstrated for redesignation to attainment of the standard include:

1. Air quality meets the standard.
2. U.S. EPA has approved the applicable SIP revisions for the standard.
3. The State has met all requirements of the Act for the nonattainment area.
4. The improvement in air quality is due to permanent and enforceable reductions in emissions.
5. A maintenance plan meeting the requirements of section 175(A) of the Act has been submitted.

Section 175(A) of the Act and U.S. EPA guidance⁵ sets the general framework for maintenance plans. The maintenance plan must provide for continued maintenance of the standard for ten years after redesignation and must include the following components:

1. An attainment emission inventory.
2. A maintenance demonstration.
3. A commitment to continue the monitoring network operation.
4. A commitment for verification of continued attainment.
5. A contingency plan to promptly correct any violation of the standard that occurs after the area has been redesignated.

In addition to the requirements above, Section 176(c) of the Act establishes transportation conformity requirements intended to ensure that transportation activities do not interfere with the attainment of federal standards. The 2021 PM_{2.5} Redesignation Request establishes motor vehicle emission budgets for emissions of PM_{2.5} and PM_{2.5} precursors in the maintenance year and interim milestone years for the maintenance plan.

⁵https://www3.epa.gov/ttn/naaqs/aqmguidance/collection/cp2/19920904_calcagni_process_redesignation_guidance.pdf

Evaluation of the 2021 PM2.5 Redesignation Request

Based on the review of the 2021 PM2.5 Redesignation Request, CARB staff has determined that this plan meets the requirements of the Act for redesignation of the South Coast to attainment of the 65 µg/m³ and 35 µg/m³ 24-hour PM2.5 standards. The following sections describe the major elements of the redesignation request and maintenance plan.

South Coast met the 24-hour PM2.5 standards

In 2016, U.S. EPA determined that the South Coast met the 65 µg/m³ PM2.5 standard based on 2011 to 2013 monitored data. Since this finding by U.S. EPA, monitored 24-hour PM2.5 levels have remained well below the 65 µg/m³ PM2.5 standard.

As described in the Background section above, after removing suspected exceptional events due to wildfire smoke from the Bobcat and El Dorado Fires, the South Coast 2020 24-hour PM2.5 design value meets the 35 µg/m³ PM2.5 standard. Specifically, the Mira Loma, Long Beach-Route 710 Near Road, Fontana, Compton, and Azusa monitors all have 2020 design values of 35 µg/m³. Further details can be found in Section 2.1 of the 2021 PM2.5 Redesignation Request.

U.S. EPA has approved 24-hour PM2.5 SIPs

U.S. EPA has approved multiple SIPs demonstrating attainment of the 24-hour standards in the South Coast. On October 29, 2013, U.S. EPA finalized approval of the 24-hour PM2.5 attainment demonstration for the 65 µg/m³ PM2.5 standard included in the 2007 AQMP, and on March 14, 2019, U.S. EPA finalized approval of the 35 µg/m³ 24-hour PM2.5 attainment demonstration and other relevant portions of the 2016 AQMP. The requirement of an approved attainment plan under section 110(k) is satisfied by the approved 24-hour PM2.5 portions of the 2007 AQMP and the 2016 AQMP.

Attainment of the 24-hour PM2.5 standards was due to permanent and enforceable reductions in emissions

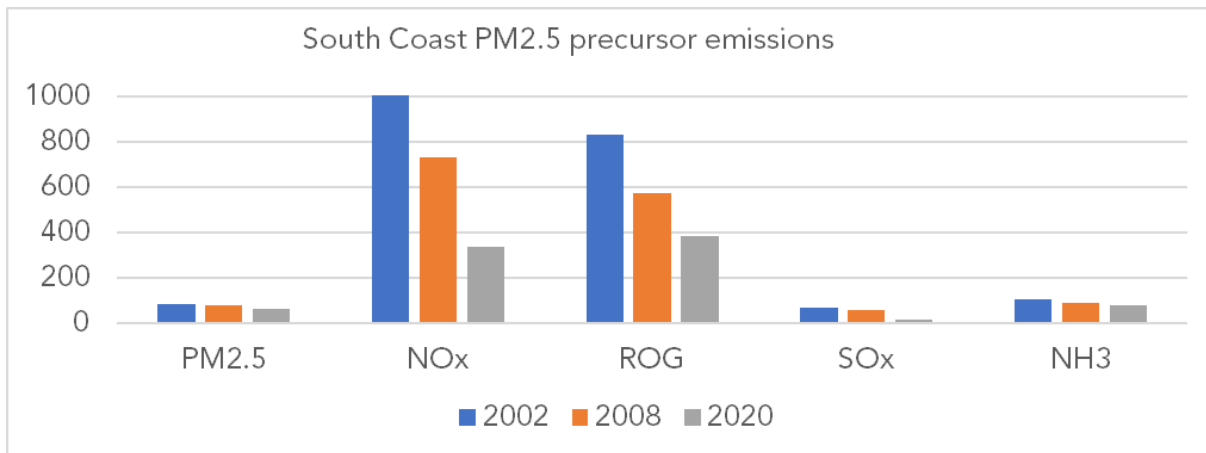
U.S. EPA guidance requires that states must be able to reasonably attribute the improvement in air quality to emission reductions which are permanent and enforceable, and that attainment was not the result of temporary reductions from adverse economic conditions or unusually favorable meteorology⁵. The District provided an analysis in Section 2.2 of the 2021 PM2.5 Redesignation Request that demonstrates the weather was not unusually favorable for the formation of 24-hour PM2.5 levels in 2020. This analysis provides evidence that 24-hour PM2.5 reductions were caused by permanent emissions reductions rather than year to year variations in meteorological factors or other factors that influence 24-hour PM2.5 levels such as mixing heights, wind speeds, and precipitation.

PM2.5 forming emissions in the South Coast have been significantly reduced due to decades of permanent and enforceable reductions from District and State regulations. District rules

controlling direct emissions of PM2.5 and PM2.5 precursors (NOx), reactive organic gases (ROG), sulfur oxides (SOx), and ammonia (NH3) from stationary sources, and State-adopted measures curtailing the emissions from mobile sources are described in Section 2.2 of the 2021 PM2.5 Redesignation Request. The full list of the relevant District and State rules can be found in the December 2020 Final South Coast Air Basin Attainment Plan for 2006 24-Hour PM2.5 Standard⁶.

Since 2002, the base year for the South Coast 2007 AQMP that included the SIP for the 65 µg/m³ PM2.5 standard, PM2.5 emissions and emissions of PM2.5 precursors NOx, ROG, SOx, and NH3 have been reduced significantly. Direct PM2.5, NOx, ROG, SOx, and NH3 have been reduced by 26 percent, 67 percent, 53 percent, 78 percent, and 27 percent respectively (Figure 2). Since 2008, when the South Coast was designated as nonattainment for the 35 µg/m³ PM2.5 standard, these same PM2.5 precursors have been reduced by 54 percent, 32 percent, and 74 percent, respectively.

Figure 2: PM2.5 precursor emissions in 2002, 2008 and 2020 (tons per day)



The significant emissions reductions over the past two decades leading to improved 24-hour PM2.5 air quality are the result of the adopted permanent and enforceable control measures targeting PM2.5 and PM2.5 precursor emissions from CARB and the District.

A maintenance plan is included meeting the requirements of section 175(A) of the Act

The maintenance plan included in the 2021 PM2.5 Redesignation Request consists of the following components: attainment emission inventories; maintenance demonstration; commitment to continue the monitoring network operation; commitment for verification of

⁶ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/2-final-attainment-plan-for-2006-24-hour-pm2-5-standard-for-the-south-coast-air-basin.pdf?sfvrsn=6>

continued attainment; and contingency plan. In addition, transportation conformity budgets are included for the relevant years in the maintenance plan.

The maintenance demonstration shows that the South Coast will maintain attainment of the 24-hour standards out to 2035, beyond the 10-year maintenance demonstration required by the Act.

Attainment Emission Inventory

U.S. EPA guidance requires that the maintenance plan must demonstrate that the 24-hour standards are attained and maintained, despite any future growth in the emissions inventory. The attainment inventory identifies the level of emissions during the period when air quality data meets attainment of the standard. The District determined that design values in 2020 met the 24-hour PM_{2.5} standards using 2018 to 2020 monitored data; therefore, the 2020 emission inventory is the attainment inventory for the maintenance plan. Appendix 1 of the 2021 PM_{2.5} Redesignation Request provides a complete 2020 emissions inventory.

Maintenance Demonstration

Section 175(A) of the Act requires that for a nonattainment area to be redesignated to attainment, the state must submit to U.S. EPA a plan revision that demonstrates the area will provide for maintenance of the standard for at least ten years after U.S. EPA has redesignated the area to attainment. For the purposes of the 24-hour standards, the 2021 PM_{2.5} Redesignation Request includes a maintenance plan demonstrating attainment out to 2035. The 2035 out year should be sufficient to account for a 10-year window after U.S. EPA finalizes the redesignation of South Coast to attainment for the 24-hour standards.

U.S. EPA guidance states that maintenance of a standard can be demonstrated by modeling future years to show that the projected mix of emissions will maintain attainment of the standard, or that future emissions of a pollutant and its precursors will remain below the level of the attainment inventory. The 2021 PM_{2.5} Redesignation Request uses photochemical modeling to demonstrate maintenance of the 24-hour standards through 2035 in the South Coast. A modeling demonstration of maintenance is critical in this plan because of the significant contribution of secondary PM_{2.5} to ambient 24-hour PM_{2.5} levels in the South Coast. Secondary PM_{2.5} is formed by chemical reactions of precursor emissions in the atmosphere.

The maintenance demonstration in the 2021 PM_{2.5} Redesignation Request uses 2018 meteorology and 2020 and future emissions to project design values in 2023, 2031 and 2035. The years 2023 and 2031 are intermediate years used to demonstrate continuous maintenance of the 24-hour standards. The modeling used the baseline emissions inventory predicted with already adopted regulations, and predicts that 24-hour PM_{2.5} design values will remain below the standards in 2023, 2031 and 2035 (Table 1). Since the modeling predicts that all future years will remain below the standard, maintenance of the PM_{2.5} standards through 2035 has been demonstrated. However, it should be noted that further reductions in PM_{2.5} precursor emissions will be achieved from control measures being developed to meet the ozone standards in the South Coast in these years. The modeling

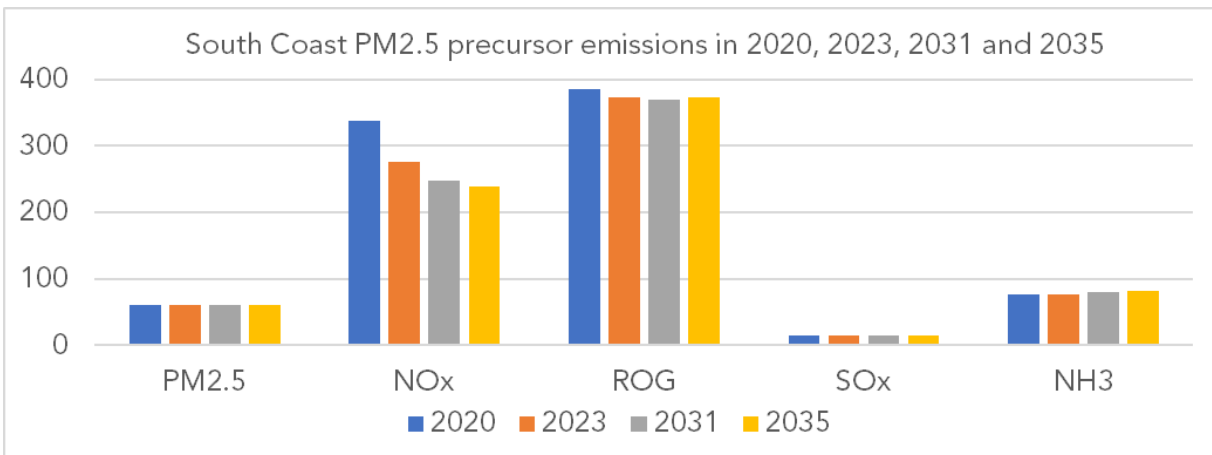
methodology is described further in the *South Coast Air Basin Attainment Plan for the 2006 24-Hour PM2.5 Standard*⁷.

Table 1 - South Coast Modeled PM2.5 Design Values in 2023, 2031 and 2035

Year	2023	2031	2035
Modeled Design Value (mg/m3)	34.6	34.9	35

The District also included emissions inventories for 2023, 2031 and 2035 in Table 4-4 of the 2021 PM2.5 Redesignation Request demonstrating that future baseline emissions inventories remain below the attainment inventory in 2023, 2031 and 2035 (Figure 3). This additional, inventory-based maintenance demonstration reiterates that the 24-hour standards are maintained through 2035.

Figure 3: PM2.5 precursor emissions in 2020, 2023, 2031 and 2035 (tons per day)



PM2.5 Monitoring Network

U.S. EPA guidance states that in areas redesignated to attainment, an air quality monitoring network must continue to operate to verify attainment. The Code of Federal Regulations Title Chapter 1 Subchapter C Part 58 lists the requirements for monitoring air quality in a nonattainment area⁸. The District exceeds the PM2.5 monitoring requirements and commits to maintain and continuously improve the PM2.5 monitoring network, an effort that is

⁷ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/2-final-attainment-plan-for-2006-24-hour-pm2-5-standard-for-the-south-coast-air-basin.pdf?sfvrsn=6>

⁸ <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-58>

undertaken through the District's *Monitoring Network Plan*⁹. Specifically, the District operates PM2.5 Federal Reference Method monitors at 19 air quality monitoring stations, in addition to quality control collocated monitors, and continuous PM2.5 monitors at 11 sampling sites.

Verification of Continued Attainment

U.S. EPA guidance requires states to track the assumptions made in maintenance plans to ensure they have not changed and therefore may invalidate the maintenance plan. The verification can be achieved by either periodic updates to the emissions inventory, or as an alternative to a complete update of the inventory, states may complete a comprehensive review of the factors used in developing the attainment inventory to show that they have not significantly changed.

The emissions inventory and its various models and inputs are regularly updated. The District submits reported emissions data from major stationary sources every year to CARB through the Annual Emissions Reporting program. CARB's on-road motor vehicle emissions model, EMFAC, provides emissions data for the on-road mobile sources and is updated approximately every three years. The District also regularly incorporates emissions reductions from regulations and programs impacting various stationary, point and area sources and mobile sources into the inventory. In collaboration with CARB and the Southern California Association of Governments which is responsible for traffic activity data needed to estimate on-road mobile emissions, the methodologies, input data, and assumptions used to develop the emissions inventory are reviewed and updated as new data and/or methods become available.

In addition to the regular updates of the emissions inventory, the District commits to verify continued attainment with regular reviews of the inputs and assumptions used for the emission inventory in the 2021 PM2.5 Redesignation Request when new information becomes available. If the District finds that these inputs have changed significantly, the existing inventory will be updated and evaluated for potential impacts to the maintenance of the 24-hour standards.

Contingency Plan

Section 175(A)(d) of the Act requires maintenance plans to include a contingency plan to address any exceedances of the relevant standard and ensure maintenance. The contingency plan should identify contingency triggers, actions to be implemented, a schedule and procedures for implementation of such actions, and a time limit for the contingency actions.

Contingency Trigger

In the 2021 PM2.5 Redesignation Request, the District defines the trigger for the contingency plan based on measured exceedances of the 35 µg/m³ PM2.5 standard. Since

⁹ <http://www.aqmd.gov/home/air-quality/clean-air-plans/monitoring-network-plan>

any exceedance of the 65 µg/m³ PM_{2.5} standard will also be included when using this trigger, it is sufficient to only consider the more stringent 35 µg/m³ PM_{2.5} standard. If the 24-hour average PM_{2.5} design value at a PM_{2.5} monitor exceeds the level of the 35 µg/m³ PM_{2.5} standard in the South Coast, the District will trigger the contingency actions specified in Section 8.2 of the 2021 PM_{2.5} Redesignation Request. Further, to provide advance notice of a violation of the 24-hour PM_{2.5} standard, design values will be calculated quarterly.

Contingency Action

The contingency actions in the 2021 PM_{2.5} Redesignation Request include a review of available data to determine the causes of the 24-hour PM_{2.5} standard exceedance and then taking appropriate action. If the causes of the exceedance are not exceptional events and can be determined, the District will evaluate potential actions to reduce emissions from the sources responsible for the exceedance.

Specifically, in the case where the source is identified, the District commits to take the following actions in the order listed:

1. Consult with the regulated industry to determine if voluntary or incentive-based control measures could reduce emissions.
2. Evaluate whether changes to enforcement of existing rules could reduce emissions.
3. Evaluate amending Rules 444 and 445 to further strengthen prohibitions on particulate emissions.
4. Propose new rules to reduce particulate emissions, if needed.

Transportation Conformity

Section 176(c) of the Act establishes transportation conformity requirements intended to ensure that transportation activities do not interfere with air quality. Transportation plans, programs, and projects that obtain federal funds or approvals must be shown to conform to applicable SIPs before being approved by a Metropolitan Planning Organization. That is, the transportation plans must not result in emissions that exceed the motor vehicle emission budget, or the portion of the total emissions inventory from on-road highway and transit vehicles in all milestone years and the horizon year for the SIP.

The 2021 PM_{2.5} Redesignation Request establishes motor vehicle emission budgets for primary emissions of PM_{2.5} from motor vehicle exhaust, tire and brake wear, and the PM_{2.5} precursors of ROG and NO_x. The motor vehicle emission budgets are included in Chapter 5 of the 2021 PM_{2.5} Redesignation Request for annual average daily emissions in the years 2023, 2031, and 2035, meeting the requirements of CFR 51.1003(d).

It should be noted that while the motor vehicle emissions budgets are consistent with the emissions inventory included in the maintenance plan, the EMFAC off-model adjustment factors used in this plan are slightly different from EMFAC off-model adjustment factors recently submitted to U.S. EPA in August 2021. The difference is because the adjustment factors developed for the maintenance plan were based on the EMFAC2017 model (2016 fleet mix), whereas the more recent off-model adjustment factors were based on the EMFAC2021 model, reflecting the latest fleet mix. Further, the off-model adjustment factors

in the 2021 PM2.5 Redesignation Request are applied at the vehicle class level, rather than total emissions level. CARB submitted the adjustment factors to U.S. EPA in August 2021 as needed for purposes of the formal submittal of the EMFAC2021 model, but the motor vehicle emissions budgets and emissions inventory in the 2021 PM2.5 Redesignation Request are based on EMFAC2017 and as such, use the appropriate adjustment factors for this model.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that State and local agency projects be assessed for potential environmental impacts. An air quality plan may be a “project” that is potentially subject to CEQA requirements. The District found that the 2021 PM2.5 Redesignation Request as proposed will not result in any potentially significant adverse effects on the environment and is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3) and 15308. The District will file a Notice of Exemption upon approval of the 2021 PM2.5 Redesignation Request by its Governing Board at its public hearing on November 5, 2021.

CARB has determined that the proposed 2021 PM2.5 Redesignation Request is a ministerial activity by CARB for purposes of CEQA (14 CCR § 15268). A “ministerial” decision is one that involves fixed standards or objective measurements, and 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). Because CARB lacks authority to modify a SIP submittal that fully complies with Act requirements, its action here is ministerial.

Furthermore, CARB has determined that the proposed 2021 PM2.5 Redesignation Request is not a “project” subject to CEQA because CARB’s approval simply acknowledges requirements that are already binding and enforceable. CARB’s approval and submission of these requirements to the U.S. EPA does not repeal or revise these requirements and would thus not cause a substantial change to the environment requiring additional environmental review. (See *Sherwin-Williams Co. v SCAQMD* (2001) 86 Cal.App.4th 1258, 1286.)

Conclusion and Staff Recommendations

CARB staff has reviewed the 2021 PM2.5 Redesignation Request and has concluded that it meets the applicable requirements in the Act.

CARB staff recommends that the Board:

1. Adopt the 2021 PM2.5 Redesignation Request for the South Coast
2. Direct the Executive Officer to submit the 2021 PM2.5 Redesignation Request to U.S. EPA as a revision to the California SIP