Sacramento County Airport System
G. Hardy Acree, Director of Airports

County Executive
Terry Schutten

County of Sacramento

October 17, 2008

Mr. Ravi Ramalingam
Manager
Northern California Liaison Section
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: Comments on Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan and Draft Environmental Impact Report (DEIR)

Dear Mr. Ramalingam:

The Sacramento County Airport System (County Airport System) appreciates the opportunity to comment and provide input on the *Draft Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan* (the Draft SIP), and the Draft Environmental Impact Report (DEIR) prepared in conjunction with the Draft SIP. The County Airport System is comprised of four airports and manages the aviation activities at McClellan Airport on behalf of another County agency, the Department of Intergovernmental Affairs and Economic Development (DEDIA). The County Airport System is tasked with serving the commercial aviation needs of the Sacramento region while conforming to the air quality attainment goals of the Sacramento Valley Air Basin (Air Basin). It is in this spirit that we provide the following comments.

Bump-up and General Conformity

Current general conformity regulations require that emission inventories used in conformity demonstrations be derived from an applicable, approved State Implementation Plan (SIP). With the pending redesignation of the Air Basin from Serious to Severe Ozone Nonattainment, the conformity *de minimis* thresholds for the ozone precursor pollutants, NOx and VOC, would be lowered from the current 50 tons per year, to 25 tons per year.

The lowered threshold increases the burden for the County Airport System to limit emissions, while developing projects to meet public transportation needs and demands. The lowered conformity review threshold also lowers the level at which future emission increases would have to be fully offset. Consistent with our goal to minimize the air quality impacts of airport activities and aviation growth, the County Airport System is incorporating air quality improvements into development plans and projects it manages. Although the estimates contained in the Sacramento International Airport Master Plan Final EIR (July 2007) indicate that short-term potential growth will be below the lowered

de minimis thresholds, the emissions growth at all regional airports needs to be carefully considered, and assurance provided, so that near-term and long-term emission budgets will accommodate required future growth.

Aircraft Emissions Budget

The County Airport System appreciates that air quality planners have recognized the need to demonstrate conformity with growth in regional airport activities. As indicated in Table 12-1 of the Draft SIP document, the inventory accommodates the Sacramento County aircraft emissions expected in the Sacramento County Master Plan. However, we are unable to determine how the near-term and long-term aircraft emission budgets were assembled for the entire region. It is unclear if and how the growth of aircraft operations within other counties in the Air Basin was included. Thus, we remain concerned that growth at airports in the other counties might be inadvertently underforecasted and that future air services at Sacramento County airports, especially Sacramento International Airport, may be constrained.

Ground Service Equipment (GSE) Emissions Budget

We are also concerned that the SIP emissions budgets shown in Table 12-1 for regional GSE may be incomplete. These budgets are expected to decline in the future, even as more GSE services will be required for additional future aircraft operations. Review of the Off-road Appendices to the Draft SIP shows that only 217 GSE items were included in the 2002 regional emission estimates. The number of GSE items in the entire air basin is expected to increase to 326 by 2018. Unfortunately, all the GSE are shown to be located only in Sacramento County, and no GSE emissions are estimated for El Dorado, Placer, Solano, Sutter, or Yolo counties. Therefore, the current and projected GSE emissions may be underestimated, because the equipment needed to provide aircraft ground services at other airports in these counties has not been included. Albeit small in number, airports such as Woodland and Yolo County, for example, do deploy GSE for towing aircraft.

In addition, future estimates for VOC and NOx emissions from GSE activities at all airports in the entire Air Basin may not be sufficient unless aggressive assumptions about equipment replacement and regulatory enforcement are made. New regulations have been adopted by the California Air Resources Board (ARB) for off-road equipment, including airport GSE. The requirement to rapidly phase-in low emission off-road engines is an important goal of these regulations. The airlines and their contractors own and operate a variety of specialized GSE to service particular types of aircraft. Airport operators do not regulate or in any way otherwise dictate the types of equipment to be used. The local air districts and ARB will be responsible for enforcing the off-road regulations with the individual tenants at each of the regional airports.

Closing

To minimize air quality impacts of airport activities, the County Airport System has incorporated air quality improvements into airport development plans. As you may know, the County Airport System has planned for additional passenger terminals, aircraft gates, taxiways, and high-speed runway turnouts to reduce emissions associated with SMF aircraft ground movements. We have also provided infrastructure to encourage the use of alternative fuels and electricity by our tenants. However, we cannot dictate the types of aircraft or other equipment that our tenants may choose to operate. Their decisions are based upon financial considerations, which become even more critically important during these difficult economic times.

We wish to clarify a statement in Section 12.5 of the Draft SIP, which was repeated in the Draft EIR. The first paragraph in this section states as follows: Sacramento County airports include: Sacramento International Airport (SMF), Mather, Executive, McClellan, Franklin, Rancho Murieta, Sunset, Natomas and Rio Linda." Readers could infer from this sentence that the County Airport System operates a total of nine airports, which is not the case. In addition, Natomas Airport has been closed for a number of years. For clarity, we suggest this paragraph be revised as follows.

> The Sacramento County Airport System is comprised of four airports: Sacramento International (SMF), Mather (MHR), Executive (SAC) and Franklin (F72). In addition, the County Airport System manages the aviation activities at McClellan Airport on behalf of another County agency. Three private airports also operate in Sacramento County: Rancho Murieta, Rio Linda, and Sunset.

In summary, while current estimates indicate that potential growth of Sacramento County airports may be below the emission projections in the regional SIP budgets, the emissions growth at **all** regional airports needs to be carefully considered. We look forward to working with the SMAQMD and others to develop SIP emission budgets that accommodate the variability expected from future regional airport activities, and to streamline general conformity analyses for airport improvement projects.

Sincerely,

Greg Rowe

Greg Rowe

Senior Environmental Analyst – Planning and Environment

C: J. Glen Rickelton, Manager – Planning and Environment

George Munson, Airport Planner – Planning and Environment