



# Considerations

## Workbook Summary

### Grants Pass Limited Maintenance Plans for CO and PM10

State Implementation Plan - air quality

#### Brief description of rule proposal

Grants Pass meets the federal air quality standards for PM10 and CO. The Clean Air Act requires 10-year maintenance plans for these pollutants. This rulemaking is the second maintenance plan, which applies until 2024. A major consideration is the urgency to complete this rulemaking by the end of the year. This will remove the requirement for costly computer modeling for the transportation conformity analysis, which is not needed due to the low pollution levels in this community. This also allows the option of adopting a "limited" maintenance plan, which are simpler and easier plans to adopt for communities which have improved air quality. Both will require a State Implementation Plan revision and submittal to EPA.

Worksheets:		Do nothing severity rating	Risk rating low → high
1	Warm up		
2	Basics		
3	Stakeholders		
4	Program		
5	Environmental		
6	Timing		
7	Financial		
8	Legal		
9	Technical		
10	Policy		
11	Political		
12	Implementation		

#### Schedule

legislative session

2014				2015				2016			
Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
		<Start	---	Effective>							
			<Notice>								
				EQC							







## Environmental

The proposed rules:

- address an environmental problem indirectly.
- have a local environmental reach.
- align with 1 action in the EPA Strategic Plan.

- do not have a selection for Natural Step support at this time.

## The proposed rules involve

Compliance	 reduced
Penalties	 not involved
Permits, certifications	 not involved
Fees	 not involved
State Implementation Plan	 involved
Land use rules	 not involved

### Ideal

What we want to happen.

Maintenance plans help keep CO and PM10 levels in Grants Pass below harmful levels and help prevent the community from exceeding federal health standards.

### Reality

What we are trying to change.

We are updating Grants Pass's 10-year maintenance plans for CO and PM10 as required by the Clean Air Act.

### Consequences

What will happen if we don't change.

If we do not update the plans, we will not be in compliance with the Clean Air Act. By adopting limited maintenance plans for the next ten years, Grants Pass local government will see significant cost savings by not having to conduct modeling associated with conformity analysis.

### Alternatives considered

There are no alternatives because the updating the plans is required by Clean Air Act.

### Research/data needed

We are using existing emissions inventory and monitoring data.







### Models

DEQ and other states have developed similar plans that can be used as models for this rulemaking.

## Public involvement

Interest in this proposal is low/medium. DEQ does not plan to appoint an advisory committee.

## Affected parties

Business	 not affected
Manufacturing	 not affected
City/county/state	 affects under 100 currently regulated
Individuals	 not affected
Custom entry	 not affected
Custom entry	 not affected