

Comment 1 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Ronald
Last Name: Stein
Email Address: Ronald.Stein@PTSadvance.com
Affiliation: PTS ADVANCE

Subject: California's Regional Haze State Implementation Plan
Comment:

The CARB Community Lacks an Understanding of What Crude Oil is Used For
Both CARB nor the Environmental, Social and Governance (ESG) investment community are divesting in crude oil that provides products and fuels for consumers that did not exist in the decarbonized world of the 1900s and before.

The California's Regional Haze State Implementation Plan will be a great step to influence America to be decarbonized, but with society unwilling to be mandated to a decarbonized world, the demand for products made from oil derivatives manufactured from crude oil continues to increase.

CARB may not be cognizant that oil and gas are an international industry with 700 refineries worldwide as they remain supportive of huge emissions from polluting foreign oil tankers and creating a national security risk for all of America, as California's dependency on foreign suppliers for California's crude oil needs, as well as the West Coast military operations, continues to grow.

As late as the 1800's, the world was "decarbonized" as there were no coal or natural gas power plants, and what the Beverly Hillbillies situation comedies of the 1960's theme song called "oil that is, black gold, Texas tea", had not been discovered as something that could be manufactured into usable products.

Before the 1900's life was hard and dirty, and most people never traveled 100-200 miles from where they were born, and life expectancy was short. Today, crude oil is manufactured into all the products used in the medical industry, fertilizers, electronics and more than 6,000 other products that are the basis of lifestyles and economies. Today, there is a lost reality that the primary usage of crude oil is NOT for the generation of electricity, but to manufacture derivatives and fuels which are the

ingredients of everything needed by economies and lifestyles to exist and prosper. Energy realism requires that the legislators, policymakers, media, and the investment community begin to understand the staggering scale of the decarbonization movement.

Of the three fossil fuels, CARB and the Environmental, Social and Governance (ESG) community is unaware that crude oil is not used for electricity. In fact, crude oil is virtually useless, unless it is manufactured (by refineries) into oil derivatives that are the basis of more than 6,000 products in our daily lives that did not exist before the 1900s, and the fuels to move the heavy-weight and long-range needs of aircraft, cruise and merchant ships, and the military and space program. Products from crude oil are the foundation of modern society and few consumers are willing to give up those benefits. Access to inexpensive, abundant, and dependable crude oil has been the cornerstone of the Industrial Revolution and humanity's achievements.

Pervasive ignorance about crude oil usage and divesting in the oil and gas industry could do irreparable harm to the industry, as well as inflict supply shortages and soaring prices upon consumers for the lesser number of products manufactured from crude oil, to meet the growing demands from society.

The renewables of solar and wind for the generation of electricity are unreliable because they are reliant on intermittent breezes and sunshine to work. To achieve continuous uninterruptible electricity, wind and solar need back-up provided by coal, natural gas or nuclear. Further, renewables CANNOT manufacture any of the products derived from crude oil, they can only generate intermittent electricity. In fact, renewables cannot exist without crude oil as all the parts of wind turbines and solar panels are made with oil derivatives manufactured from crude oil.

CARB, Banks, and investment giants that are driving today's Environmental, Social and Governance (ESG) divesting in fossil fuels are all the rage on Wall Street these days, to divest in all three fossil fuels of coal, natural gas, and crude oil, just to reduce emissions. It is appalling that both President Biden and the United Nations support allowing the investment community to collude to reshape economies and our energy infrastructure.

Before divesting in all three fossil fuels of coal, natural gas, and crude oil, where is the replacement or clone for crude oil, to keep today's societies and economies running?

Looking back a little more than 100 years, it's easy to see how civilization has benefited from more than 250 leading-edge, hydrocarbon processing licensed refining technologies used by the more than 700 refineries worldwide that service the demands of the eight billion people living on earth with more than 6,000 products made from the oil derivatives manufactured out of raw crude oil at refineries. None of these products were available to society before 1900.

Getting off crude oil would reverse much of the progress made over the last few centuries. The inventions of the automobile, airplane, and the use of petroleum in the early 1900s led us into the Industrial Revolution and victories in World Wars I and II.

The products from fossil fuels have reduced infant mortality, extended longevity from 40+ to more than 80+, allowed us

to move to anywhere in the world via planes, trains, ships and vehicles, and virtually eliminated weather related fatalities.

As CARB and ESG progresses, banks and investment giants have short memories of petrochemical products and human ingenuity being the reasons for the world's population increasing from one to eight billion in less than 200 years. Efforts to cease the use of crude oil could be the greatest threat to civilization, not climate change, and lead the world to an era of guaranteed extreme shortages of fossil fuel products, like we had in the decarbonized world in the 1800s, which may result in billions of fatalities from diseases, malnutrition and weather-related deaths trying to live without the more than 6,000 products currently benefiting society. Efforts toward abandoning fossil fuels will further deprive and/or delay providing nine percent of humanity, or more than 689 million people, in this world that are living below the international poverty line of \$1.90 a day, from enjoying the same products that benefit the wealthy and healthy countries. Depriving citizens of the more than 6,000 products that were non-existent before 1900, made from the oil derivatives manufactured from crude oil, appears to be immoral and evil as extreme shortages will result in billions of fatalities from diseases, malnutrition and weather-related deaths. Bank boardroom decisions that are allowing the investment community to collude to reshape economies and lifestyles, so that they are in line with the preferences of banks and other financial institutions, is an extremely dangerous precedent. Consumers never voted to give banks this sort of control over our world. The audacity is overwhelming that those ESG banks and investment giants, in the healthier and wealthier countries, insist that we should limit poor countries' future access to the products from fossil fuels. Inexpensive, reliable, accessible power, and products from fossil fuels are lifesaving, and one of the best ways out of poverty. Unintended consequences of the ESG rage ridding the world of crude oil usage would be the restricted supply and resultant inflationary pressures on the limited supply of products and fuels manufactured from crude to meet growing demands that support:

§
Asphalt for roughly sixty-five million miles of roads in the world.

§
Tires for the 1.4 billion vehicles in the world.

§
Fertilizers to feed the eight billion in this world on an increasingly resource-stretched and crowded earth.

§
Medical supplies that are primarily made from oil derivatives.

§
Jets that comprise more than 50,000 aircraft for military, commercial, private and the President's Air Force One.

§

Merchant ships that comprise more than 53,000 vessels that move products throughout the world.

§

Vehicles that are mostly made of plastics.

§

Renewable components of wind turbines and solar panels that are made from oil derivatives.

The domino effects of tinkering with the supply chain of fossil fuels are supply shortages and soaring prices for the consumers, for not only electricity, but for the thousands of products that support the entire medical industry, all branches of the military, airports, electronics, communications, merchant ships, container ships and cruise liners, as well as asphalt for roads, and fertilizers to help feed the world.

It is time for the people to demand anti-ESG bills from their legislatures and put a stop to the banks that are colluding to reshape economies and lifestyles, and inflicting shortages and inflation on consumers.

Ronald Stein

Pulitzer

Prize nominated author, Policy advisor for The Heartland Institute

on Energy, and National TV Commentator- Energy & Infrastructure with Rick Amato.
<http://www.energyliteracy.net/>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-14 06:18:18

No Duplicates.

Comment 2 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Mark

Last Name: Rose

Email Address: mrose@npca.org

Affiliation: National Parks Conservation Assoc.

Subject: Regional Haze Plan Comment and Hearing Extension Request

Comment:

On behalf of National Parks Conservation Association, please see the attached letter requesting that the California Air Resources Board grant an extension on the public comment deadline and public hearing date for California's Regional Haze State Implementation Plan ("SIP") for the Second Implementation Period.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-hazesip2021-VyVSPANwU15WNVMr.pdf'

Original File Name: RHR Extension Request.pdf

Date and Time Comment Was Submitted: 2022-05-23 12:55:14

No Duplicates.

Comment 3 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Juan

Last Name: Gonzalez

Email Address: Carloshoffdairy88@gmail.com

Affiliation:

Subject: There's no future, if there's no food

Comment:

many years, government is subestimes agriculture power, power that came from farmers and they workers. Workers that go to work every day, on cars, vans, or buses, that use fuel to move, that same fuel big trucks use to deliver all the food to all Americans. So how we going to get food on are tables to eat. What you goin to tell to your children when they ask for frut? That musk, or gates are going to make food from electricity? Well I hope are everyone by more realistic.. thanks

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-06-07 17:12:42

No Duplicates.

**Comment 4 for California's Regional Haze State Implementation Plan
(hazesip2021) - Non-Reg.**

First Name: Frank

Last Name: Lands

Email Address: PWR_Regional_Director@nps.gov

Affiliation: Regional Director, NPS, IR 8,9,10,12

Subject: NPS Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-hazesip2021-AG4HcQByAw8CZwBv.pdf'

Original File Name: NPS comments CA_RH_SIP-REC-PPEC.pdf

Date and Time Comment Was Submitted: 2022-06-09 11:52:02

No Duplicates.

Comment 5 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Christopher
Last Name: Lish
Email Address: lishchris@yahoo.com
Affiliation:

Subject: We need real pollution cuts to protect our health and our parks. Reject the proposed haze.

Comment:

Sunday, June 12, 2022

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: We need real pollution cuts to protect our health and our parks. Reject the proposed haze plan. --
Notice of Public Meeting to Consider California's Regional Haze State Implementation Plan (hazesip2021)

Dear Secretary for Environmental Protection
Jared Blumefeld, CARB Chair Liane M. Randolph, and CARB Boardmembers,

I write to urge the California Air Resources Board (CARB) to reject the proposed haze plan in order to better protect our health and to ensure clean air and clearer views in our national parks and wilderness areas.

California is home to some of our country's most beloved national park sites like Yosemite, Sequoia, and Joshua Tree, yet these national treasures suffer from some of the worst air pollution and haziest skies of any in the nation. Dirty air has led to dramatically obscured views, harms the health of people across our state, park visitors and employees, and negatively affects the long-term viability of our already threatened park ecosystems.

CARB's federal regional haze plan is supposed to work towards improving visibility in many of California's national parks and wilderness areas. Yet, instead of analyzing all sources of haze pollution and requiring any new pollution controls on the major industrial sources of haze pollution in the state like oil and gas and chemical facilities and pulp and paper mills, CARB is proceeding with a plan that declares that existing clean vehicles rules to cut nitrogen oxides are good enough. While vehicles are a significant part of our haze pollution problem, what is already on the books and on the way to cut one pollutant does not suffice and is simply unacceptable.

Given California's worst in the nation air quality, we need a dramatically stronger regional haze plan that properly analyzes all types of haze pollution and requires unique emission controls from industrial sources of pollution harming our national parks and wilderness areas and local communities.

Please reject staff's haze plan and require significant improvements to address more pollution types and sources to actually address the crisis of dirty air in our state

and in our national parks.
Thank you for your consideration of my
comments. Please do NOT add my name to your mailing list. I will
learn about future developments on this issue from other
sources.
Sincerely, Christopher LishSan
Rafael, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-06-12 19:46:39

No Duplicates.

**Comment 6 for California's Regional Haze State Implementation Plan
(hazesip2021) - Non-Reg.**

First Name: Janie
Last Name: Kilgore
Email Address: janie.kilgore@poet.com
Affiliation: POET, LLC

Subject: POET CARB Regional Haze SIP Comments
Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-hazesip2021-AXFdNFQwByAHXlc0.pdf>'

Original File Name: POET CARB Regional Haze SIP Comment 6.13.2022.pdf

Date and Time Comment Was Submitted: 2022-06-13 12:50:37

No Duplicates.

**Comment 7 for California's Regional Haze State Implementation Plan
(hazesip2021) - Non-Reg.**

First Name: Rebekka

Last Name: Fine

Email Address: Rebekka.Fine@arb.ca.gov

Affiliation:

Subject: Regional Haze SIP - Comment Received Via Email

Comment:

See attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-hazesip2021-OIUBTcHwU2MFcm0d.pdf>'

Original File Name: Re_ Data Request Regarding the CA RH SIP.pdf

Date and Time Comment Was Submitted: 2022-06-13 14:03:45

No Duplicates.

**Comment 8 for California's Regional Haze State Implementation Plan
(hazesip2021) - Non-Reg.**

First Name: Craig

Last Name: Thomas

Email Address: craigthomas068@gmail.com

Affiliation: The Fire Restoration Group

Subject: Comments on Draft June 13, 2022 RHR-California SIP proposal

Comment:

Please find comments from the Fire Restoration Group on the California RHR State Implementation Plan draft proposal.

Sincerely,

Craig Thomas, Director
The Fire Restoration Group

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-hazesip2021-AGNdOIUmWGkKUwh6.pdf'

Original File Name: CARB Regional Haze--SIP comments from the Fire Restoraion Group 6-23-22.pdf

Date and Time Comment Was Submitted: 2022-06-13 14:48:02

No Duplicates.

Comment 9 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Natalie
Last Name: Levine
Email Address: nlevine@npca.org
Affiliation:

Subject: Organizations Comments on Regional Haze Plan
Comment:

Please
see attached letter from Access
Fund, Central Valley Young Environmental Advocates, Coalition to Protect
America's
National Parks, National Parks Conservation Association
and Outdoor Alliance
California.
Please be in touch with any of the signatories with
any questions.

Katie Goodwin
California Regional Director
Access Fund
Bishop, CA
katie@accessfund.org

Michael Murray

Kamryn Kubose
Executive Director
Central Valley Young Environmental
Advocates
Fresno, CA
centralvalleyyea@gmail.com

Chair
Coalition to Protect America's
National Parks
Washington, DC
editor@protectnps.org

Mark Rose
Sierra Nevada Program Manager
National Parks Conservation

Association
Sacramento, CA
mrose@npca.org

Katie Hawkins
California Program Manager
Outdoor Alliance
California
Truckee, CA
katie@outdooralliance.org

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-hazesip2021-UDMBaFAwU2wHaFMn.pdf>'

Original File Name: Coalition CARB Regional Haze Plan Comments_61322.pdf

Date and Time Comment Was Submitted: 2022-06-13 15:25:58

No Duplicates.

Comment 10 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Sara
Last Name: Laumann
Email Address: sara@laumannlegal.com
Affiliation: Laumann Legal LLC

Subject: Conservation Organizations' Comments on California's Proposed State Implementation Plan Re

Comment:

National Parks Conservation Association, Sierra Club, and Coalition to Protect America's National Parks submit the attached comments regarding the California Air Resources Board's DRAFT California's Regional Haze Plan for the Second Implementation Period. Links to the Exhibits to these comments are included at the end of the comment letter and I will submit the Exhibits to these comments via a separate message.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-hazesip2021-VDoGcANhWWsHZFcj.pdf>'

Original File Name: NPCAetal_Comment Ltr CARB RH SIP SIP_06132022.pdf

Date and Time Comment Was Submitted: 2022-06-13 19:58:33

No Duplicates.

Comment 11 for California's Regional Haze State Implementation Plan (hazesip2021) - Non-Reg.

First Name: Sara

Last Name: Laumann

Email Address: sara@laumannlegal.com

Affiliation: NPCA et al (Conservation Organizations)

Subject: Conservation Organizations' Comments on California's Proposed State Implementation Plan Re

Comment:

National Parks Conservation Association, Sierra Club, and Coalition to Protect America's National Parks ("Conservation Organizations") submit the attached comments, technical reports and exhibits via one compressed zip file regarding the California Air Resources Board's DRAFT California's Regional Haze Plan for the Second Implementation Period.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-hazesip2021-VTtdK1AyUWNSMVAk.zip'

Original File Name: NPCAetal_Comment Ltr CARB RH SIP SIP_06132022.zip

Date and Time Comment Was Submitted: 2022-06-13 20:12:35

No Duplicates.

Comment 1 for California's Regional Haze State Implementation Plan (hazesip2021). (At Hearing)

First Name: Katie
Last Name: Goodwin
Email Address: katie@accessfund.org
Affiliation: Access Fund

Subject: Access Fund Comments on CA Regional Haze State Implementation Plan
Comment:

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">My name is Katie Goodwin and I am the California Regional Director and Policy Analyst for the non-profit Access Fund. The Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund has over 20,000 members and over 123 local affiliates. California is one of our largest member states.</p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">Climbers from around the world visit California’s national parks and wilderness areas to enjoy some of the world’s best rock climbing, from Yosemite to the high Sierra to Joshua Tree. Clean air is a significant part of the climbing experience—we need it to breathe and to take in the beautiful scenery of the wild places we seek out. </p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">But over the decades, haze—from cars and trucks, oil and gas operations, and other industrial sources—has degraded visibility and harmed people’s health in national parks and local communities across the country. In fact, nearly 90% of national parks are plagued by haze pollution—visitors to California’s national parks miss out on an average of 90 miles of visibility in parks. </p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">The Clean Air Act includes a time-tested, effective program designed to protect “Class 1” airsheds

including National Parks and wilderness areas that provide outstanding recreational opportunities. This Regional Haze Rule has resulted in real, measurable, and noticeable improvements in visibility and air quality in national parks and in communities across the nation. </p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">Despite great strides to date, California’s proposed regional haze plan fails to require adequate measures to reduce pollution and falls short on the state’s obligation to improve air quality for our parks and communities.</p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">Poor air quality in our national parks also threatens our local economies. Our national parks provide nearly \$42 billion in economic benefits and support hundreds of thousands of jobs across the country. In 2020 California’s recreation economy provides \$44.5 billion dollars in consumer spending and provides 488,755 direct jobs. Without strong safeguards protecting the air we breathe, we can’t keep these places and local economies strong, let alone keep people healthy. Every visitor to a national park deserves to experience clean air and clear views. </p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">The same sources of pollution causing haze in our national parks are also disproportionately affecting communities near those sources—communities that are often living below the poverty line, communities of color, or both. Alongside the National Parks Conservation Association, we’re calling on state agencies and the Environmental Protection Agency (EPA) to account for the benefits that controls on haze-causing pollutants have for disproportionately affected communities and ensure that those benefits are considered and prioritized in developing state or federal implementation plans.</p>

<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;">Our top recommendations are:</p>

```
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.295; margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span style="font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Fully analyze the 42 stationary sources identified as contributing to haze pollution using a four-factor analysis as required by the Regional Haze Rule, including major sources of human made sulfur dioxide pollution.&nbsp;</span></p>
</li>
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.295; margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span style="font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Implementing strong, significant, and federally enforceable emission reducing measures for oil refineries, cement manufacturing facilities, and other major industrial sources of haze identified through a proper four-factor analysis process.</span></p>
</li>
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.28; margin-top: 0pt; margin-bottom: 8pt;" role="presentation"><span style="font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Thoroughly assessing and addressing climate and environmental justice impacts (as EPA recommended) to benefit environmental justice communities near where the major sources of haze are located. These include areas near the port of Los Angeles and Northern Bay Area communities where many oil refineries are located.&nbsp;</span></p>
</li>
</ul>
<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Thank you for your time and consideration.</span></p>
<p dir="ltr" style="line-height: 1.2; margin-top: 12pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Calibri,sans-serif; color: #000000; background-color: transparent;
```

font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;">Sincerely,</p>
<p><span
id="docs-internal-guid-d4c02436-7fff-46c7-54b5-ceee89e3a36d"></p>
<p dir="ltr" style="line-height: 1.2; margin-top: 12pt;
margin-bottom: 0pt;"><span style="font-size: 11pt; font-family:
Calibri,sans-serif; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;">Katie Goodwin-Access Fund, California Regional
Director</p>
<p dir="ltr" style="line-height: 1.2; margin-top: 12pt;
margin-bottom: 0pt;"><span style="font-size: 11pt; font-family:
Calibri,sans-serif; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;"></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-24 08:43:50

No Duplicates.

Comment 2 for California's Regional Haze State Implementation Plan (hazesip2021). (At Hearing)

First Name: Natalie

Last Name: Levine

Email Address: nlevine@npca.org

Affiliation:

Subject: Natalie Levine_National Parks Conservation Association Verbal Testimony
Comment:

<p> </p>

<p class="MsoNormal">Good morning, my name is Natalie Levine and I am the Climate and Conservation Program Manager at National Parks Conservation Association (NPCA). Thank you for the opportunity to comment today on California's Second Regional Haze State Implementation Plan. NPCA is the oldest and largest nonpartisan nonprofit advocacy organization for our national parks. We have over 1.7 million members and supporters across the country with over 207,000 here in California. Along with my testimony, I have submitted 636 comments from national park advocates to the Board comment log. </p>

<p class="MsoNormal">As you know, California boasts some of the nation's most treasured national parks and public lands, many of which are considered Class I areas under the Regional Haze Rule. I've been lucky to have been able to travel to amazing treasures like Yosemite, Redwood and Joshua Tree National Parks as well as pristine wilderness areas in the Lake Tahoe Basin.</p>

<p class="MsoNormal"> </p>

<p class="MsoNormal">I currently live in the Bay Area, not only about 20 driving miles from Class I area Point Reyes National Seashore but also 20 to 30 driving miles from oil refineries along San Pablo Bay that are polluting our air, making our communities sick and hastening climate change. I worry about the air my two small children breathe in every day.</p>

<p class="MsoNormal">California has the opportunity now to clean up air pollution from these oil refineries, and dozens of other industrial sources in the state, through the state's Second Regional Haze State Implementation Plan. The Regional Haze Rule is a time-tested and effective program to not only clear haze pollution from national parks and wilderness areas, but from our neighborhoods and communities. The opportunity that our state has right now to clean up pollution from specific industrial sources cannot be missed.</p>

<p class="MsoNormal">The State Implementation Plan, or SIP, currently proposed by the California Air Resources Board falls significantly short of the state's obligation to restore clean air in our Class I areas. The state improperly concludes that no new reductions in pollution are warranted. If CARB submits the current plan as-is to the U.S. EPA, it will not comply with the Clean Air Act and the Regional Haze Rule as it does nothing new to limit haze-causing air pollution.</p>

yes; " "/>

Of the 42 pollution sources that CARB selected for review, staff only selected one single source for further analysis and concluded that no new emissions reductions were needed for that source. Moreover, CARB staff decided to only focus on nitrogen oxide pollution in their review and not other manmade pollutants that contribute to haze like sulfur dioxide. NPCA believes all of these decisions by CARB are unacceptable & California's haze plan leaves numerous opportunities to cut pollution from stationary industrial facilities off the table, failing to adequately reduce haze pollution in our parks and limiting additional co-benefits that could be achieved through the haze rule.

Furthermore, failure to fully analyze more industrial facilities in California contributes to the state's inaction on environmental injustices of air pollution in low-income communities and communities of color where many of the worst polluting sources are located.

NPCA appreciates CARB's four-factor analysis of mobile sources like cars and trucks, making California the first state to include control measures for this sector in the haze plan. Though we are disappointed that CARB relied on existing programs to curb mobile source emissions and did not specify new control measures for the sector.

Before CARB submits their haze plan to the EPA, NPCA requests that the state significantly revises its draft SIP to fulfill its obligations under the Clean Air Act. Specifically, we request you:

1. Fully analyze the 42 stationary sources identified as contributing to haze pollution using a four-factor analysis, including major sources of humanmade SO2 pollution.
2. Implement strong, significant, and federally enforceable emission reducing measures for industrial sources of haze identified through a proper four-factor analysis process.
3. Thoroughly assess and address climate and environmental justice impacts (as EPA recommends) to benefit environmental justice communities near where the major sources of haze are

located. </p>
<p class="MsoNormal"> </p>
<p class="MsoNormal">The Clean Air Act's Regional Haze Rule is an effective program that has resulted in real, measurable, and noticeable improvements in national park visibility and air quality. I hope CARB strongly considers making improvements to the plan to not only restore clean and clear skies to our parks and wilderness areas, but to also clear the air for our communities and next generations.</p>
<p class="MsoNormal">Thank you for your time and I look forward to reviewing improvements to this plan.</p>
<p>Sincerely, </p>
<p>Natalie Levine</p>
<p>nlevine@npca.org</p>
<p> </p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-hazesip2021-B2IWMVAIADIAagVs.pdf>

Original File Name: Natalie Levine_NPCA_Regional Haze Testimony.pdf

Date and Time Comment Was Submitted: 2022-06-24 09:00:39

No Duplicates.

Comment 3 for California's Regional Haze State Implementation Plan (hazesip2021). (At Hearing)

First Name: Natalie

Last Name: Levine

Email Address: nlevine@npca.org

Affiliation:

Subject: 636 National Park Advocate Comments on Regional Haze Plan

Comment:

<p>Please consider comments from 636 national park advocates on the regional haze plan.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-hazesip2021-UmRdaFViAw8CagNi.pdf>

Original File Name: 636 National Park Advocate Regional Haze Comments_CA.pdf

Date and Time Comment Was Submitted: 2022-06-24 09:04:48

No Duplicates.