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Public Comments to the California Air Resources Board
Regarding the San Joaquin Valley Ozone Attainment Plan

My name is Dr. David Lighthall and I am Senior Scientist for Environmental Health at the Central Valley Health Policy Institute at CSU, Fresno. Over the course of the past 12 months I have been closely involved in the development of the San Joaquin Valley ozone attainment plan. I am currently a member of the Valley Air District's Fast Track Task Force as well as ARB's Air Quality Task Force for the San Joaquin Valley. Before providing my central observations and recommendations, I would like to express my appreciation for the Task Force leadership of Board members Dee Dee D'Adamo and Judy Case. ARB staff, including Lynn Terry and Kurt Karperos, have also been very helpful in helping us sort through a number of very complex issues.

1. There is a fundamental question regarding the proposed San Joaquin Valley ozone attainment plan (SIP): Does the plan, which has adopted the Extreme 2024 attainment date, provide the most powerful means for accelerating the path to ozone compliance?
 - a. Setting aside for the time being the significant barriers to meeting the US EPA's threshold criteria for a Severe attainment plan with a 2017 deadline, discussion with Air District and ARB staff in our Air Quality Task Force meeting of November 7 indicated that many businesses that would face emission restrictions under an Extreme 2024 plan will in fact not be regulated under a Severe 2017 plan.
 - b. This reduced leverage on emission sources under a Severe plan raises the risk of a lower rate of yearly reduction in NOx and ROG. In turn, this could mean that we could be further from ozone attainment by 2017 under a Severe plan than under an Extreme plan with tougher controls on emission sources.
 - c. As most observers would likely agree, there is a very high probability that the US EPA will be lowering its national ambient air quality standard (NAAQS) for ozone within the next several years. Achieving attainment by 2017 under this new standard is even more problematic.
 - d. In the meantime, we need to put into place the strongest and most inclusive air quality regulations possible in order to maximize the yearly rate of tonnage reductions in ozone precursors.
2. As is apparent, environmental and community groups will continue to place a great deal of pressure on the San Joaquin Valley Air Pollution Control District to maximize control measures on sources under its jurisdiction. However, to the extent that ozone arises from mobile source and consumer product emissions, Valley ozone attainment will depend on the Air Resources Board making difficult decisions. The recent adoption of the off-road mobile source rule is an excellent start. I know that was a very difficult decision.
3. Given the low carrying capacity for air pollution in the San Joaquin Valley, rapid development and adoption of new technologies will be critical to the earliest possible attainment of the ozone standard. I am pleased to see ARB staff proposed a

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leadership role for the agency in serving as a catalyst for technological innovation in the Valley.

4. The other key element for early attainment will be incentive funds for accelerated emission reductions. As is painfully apparent here in California, creating new funding sources to achieve collective social benefits is increasingly difficult. ARB is in an excellent position to serve as an objective source of scientific justification for cost-effective public investments in emission reduction programs. As in the case of technological development, I would strongly encourage ARB to play a leadership role in evaluating fiscal options for emission reduction programs and bringing these findings to the attention of California decision-makers and the public.