



October 2, 2019

Richard Corey
Executive Officer,
Air Resources Board
1001 "I" Street
Sacramento, CA 95814



Re: Lack of Progress Toward Meeting Air Quality Standards in South Coast Air Basin

Dear Mr. Corey:

As you know, the South Coast Air Basin (SCAB) has the worst ozone problem in the country, along with a serious particulate matter 2.5 problem. Indeed, the South Coast region just recently experienced 85 straight days of smog levels in excess of federal health-based standards.¹ The basin faces a series of six deadlines between this year and 2038 for attaining national standards. Our organizations have grown increasingly concerned that we are clearly not on a track to attainment for nearly all of these deadlines, and we ask you to take quick action to address the problem.

At the time the 2016 Air Quality Management Plan for the South Coast Air Quality Management District (SCAQMD) was approved, we expressed our concern about its heavy reliance on incentive funds that did not exist. A letter from nine groups to SCAQMD Executive Officer Wayne Nastri on September 9, 2016 said in part:

¹ California Air Resources Board, "AQMIS", <https://tinyurl.com/y5t7nej4> (accessed September 26, 2019.)

“The AQMP relies too heavily on incentive programs. While our organizations are not opposed to incentive programs per se, the unprecedented level of voluntary incentive programs in this plan should create pause for everybody...Political will or coalition work does not convert a voluntary and unfunded program into a legally compliant enforceable plan. The plan does not include assurances that adequate funds are available to carry out the plan as required by Section 110(a)(2)(E) of the Clean Air Act... The District has exchanged a “black box” for an “empty cash box,” which will not work and does not meet the mandates of the federal Clean Air Act and California’s Health and Safety Code. Securing sufficient funding to achieve attainment under the proposed scenario would take a miracle. State and federal law do not allow the South Coast AQMD to rely upon miracles to demonstrate future compliance in its clean air plans. Attainment demonstrations must be based on legally enforceable, quantifiable, verifiable, and reasonably achievable emission reductions, not wishful thinking and unrealistically optimistic theoretical projections about securing funds from unwilling sources. Flying pigs and \$14 billion for clean air investments exist only in fantasy. The AQMP must be based in reality.”

Unfortunately, events since then have only confirmed our doubts. The vast majority of the NO_x reductions needed by 2023 – 108 tons per day out of the 114 total – were to come from the nebulous category “deployment of advanced cleaner technologies,” but little has been accomplished in this category.² SCAQMD has yet to present a proposal for any of the much-needed facility-based measures, and relatively few of the incentive dollars necessary to speed the turnover of old dirty engines to cleaner technologies have materialized. SCAQMD now estimates a need for incentive funds of \$1-2 billion per year, while it expects to receive \$230-240 million annually. Efforts to plug the gap with a sales tax ballot measure have barely gotten off the ground, this year’s state budget does not come close to supplying the funding CARB has identified as necessary for heavy-duty vehicles, and prospects are dim for any major funding increases in the near future.

In addition, planned emission reductions from the AB 617 best available retrofit emission reduction technology requirements have been sidelined and put in jeopardy by complex legal issues and ongoing debates over how to dismantle the RECLAIM cap and trade program.

You recently updated the Board and appointed a working group to monitor progress on the San Joaquin Valley’s PM 2.5 Plan, and we ask you to do the same for the South Coast. The working group should have representatives from CARB, SCAQMD, USEPA, air quality advocacy groups and industry. The working group should be charged with monitoring progress on the AQMP and determining how to make that plan’s promises a reality. The group should review what measures could produce the emission reductions the SCAB will need to attain national and state standards.

We will contact your office to schedule a meeting to discuss this letter, and we look forward to your response.

² See 2016 AQMP, p. ES-2, and Table 4-5, pp. 4-35 to 4-36.

Respectfully,

Bill Magavern
Coalition for Clean Air

Bahram Fazeli
Communities for a Better Environment

Dan Jacobson
Environment California

Jane Williams
Californian Communities Against Toxics

Robina Suwol
California Safe Schools

Maya Golden-Krasner
Center for Biological Diversity

Rebecca Overmyer-Velazquez
Clean Air Coalition of North Whittier and Avocado Heights

Felipe Aguillar
Comite Pro Uno

Cynthia Babich
Del Amo Action Committee

Jesse Marquez
Coalition for a Safe Environment

cc: Mr. Wayne Nastri, Executive Officer,
SCAQMD