

March 13, 2017

Mary D. Nichols
Chair, California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Request to Table Action on State SIP Strategy until Sufficient Additional Measures are Included for San Joaquin Valley's PM2.5 Attainment Needs

Dear Chair Nichols,

As you know, the Valley Air District working with ARB staff is currently developing the federally mandated attainment plans for multiple PM2.5 standards through an extensive public process. Meeting the federal health-based standards for PM2.5 in the San Joaquin Valley requires local measures to reduce directly emitted particulate matter as well as state and federal measures to reduce mobile source emissions.

The Valley Air District has already identified a long list of potential local measures to reduce directly emitted PM2.5 and NOx emissions and is currently conducting a comprehensive public process including Public Advisory Workgroup meetings, workshops and public hearings to ultimately define the achievable reductions from these measures. Nonetheless, preliminary modeling assuming best-case, aggressive projections for reductions in directly emitted PM2.5 and NOx emissions from local measures show that additional NOx reductions from mobile sources (over 100 tons/day) are necessary to attain the federal PM2.5 standards.

Mobile sources are the largest contributors to the formation of PM2.5 and ozone in the San Joaquin Valley, contributing over 85% of the total NOx emissions in the Valley. Therefore, it is critical for the Mobile Source Strategy to contain clean air measures that assist the San Joaquin Valley in meeting federal health based standards within the time deadlines prescribed under the federal Clean Air Act.

At the October 2016 ARB meeting in Fresno, the Air Resources Board unanimously voted to direct ARB staff to revisit the Mobile Source Strategy and prioritize Valley attainment needs. Unfortunately, the proposed update to the Mobile Source Strategy published on March 7, 2017 (included in draft State SIP Strategy), will not add any new measures aimed at providing the added reductions needed in the San Joaquin Valley by 2025. While ARB staff has indicated that they will adopt a commitment in the March adoption hearing to return in the Fall with added measures for the San Joaquin Valley, this commitment is not enough.

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To allow for time to incorporate additional measures to achieve the significant emissions reductions required for the San Joaquin Valley in the 2019 to 2025 attainment timeframe, the Valley Air District's Citizen's Advisory Committee requests that the Air Resources Board table action on the Mobile Source Strategy until specific reductions from this source category are detailed within it, that support the District's PM2.5 attainment strategy within the State Implementation Plan. This recommendation reflects a unanimous position by all members of the Citizen's Advisory Committee, comprised of the Environmental Interest Group, Industry/Ag Interest Group, and City Interest Group.

Respectfully,


Manuel Cunha
Industry/Ag Interest Group


Kevin Hamilton
Environmental Interest Group


Rey Leon
City Interest Group