



Public Hearing Written Testimony on California's Second Regional Haze State Implementation Plan

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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.

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.

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.

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.

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.

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.

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.

Thank you for your time and I look forward to reviewing improvements to this plan.