

Subject: Public comment, sjv0520: Notice of Public Meeting to Consider Adoption of a Technical Revisions to the San Joaquin Valley PM2.5 SIP

Here's what's at issue: for the San Joaquin Valley's 2018 integrated PM2.5 plan to be approved by EPA, approval of an attainment deadline extension for the 2006 PM2.5 NAAQS must first be approved by EPA, and that approval is contingent on a demonstration that the SJVAPCD fulfilled a prior commitment in the 2012 SIP to have reduced direct PM2.5 emissions (from residential wood burning) by 1.9 tons a day.

This revision before the Board today seeks to retroactively reduce that prior commitment to a reduction in direct PM2.5 emissions of .86 tons per day.*
As EPA describes this action:

“CARB seeks to revise the 2012 PM2.5 Plan commitment to achieve 24- hour average, aggregate emission reductions of 1.9 tpd by 2017 by replacing it with a commitment to achieve 24-hour average, aggregate emission reductions of 0.86 tpd by 2017 based on the emissions inventories developed for and used in the 2018 PM2.5 Plan.18 CARB states that the updated inventory reflects real decreases in residential wood burning emissions...”

[...]

“[A] letter of February 4, 2020, to the EPA that described how CARB updated such emissions estimates as part of its routine emissions inventory improvement process using the latest data.”

[...]

“ The updated methodology is based on a 2014 survey of San Joaquin Valley residents, which provided more representative data regarding fuel usage rates and the number of wood burning devices in use in the District.”

—*from*: Proposed Rule by EPA, Part III, Review of the PM2.5 Prior Commitment Revision: 40 CFR Part 52 [EPA–R09–OAR–2019–0318; FRL–10009– 28–Region 9] Clean Air Plans; 2006 Fine Particulate Matter Nonattainment Area Requirements; San Joaquin Valley, California. (available at <https://www.govinfo.gov/content/pkg/FR-2020-05-12/pdf/2020-09731.pdf>)

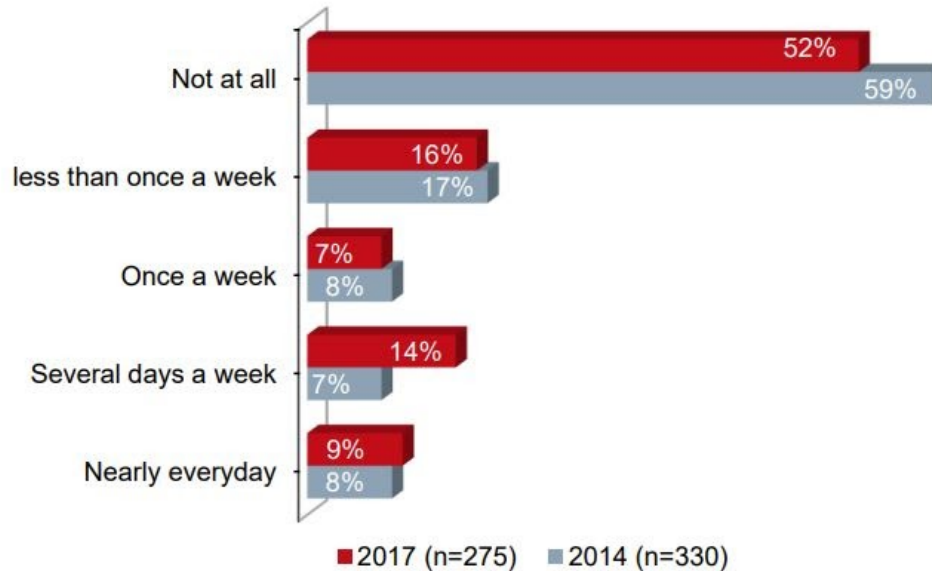
In 2014, SJVAPCD revised their wood-burning Rule 4901, with more stringent air quality thresholds adopted for triggering announcements of “no burn days” during the four-month wood-burning season, November through February.

Did the 2014 revision to Rule 4901 and the announcement of more “no burn” days decrease residential wood-burning by 2017?

Not according to a second survey conducted in 2017, which shows that by 2017 *fewer* San Joaquin Valley residents reported they were *not* using a fireplace or wood-stove in the winter at all, and twice as many Valley residents reported using a fireplace or wood-stove several days a week compared to 2014. (Both of those results were statistically significant, outside of the reported polling margin of error of 4 percent.)

**Figure 2: Frequency of Wood Burning
Valley Residents Overall, 2014 and 2017**

How often residents use their wood-burning devices during winter months



*Figure based on Q5: "How often do you use your fireplace/stove in the winter? Nearly every day, several days a week, once a week, less than once a week, or not at all?" Don't know/refused not charted.

—from SJDAPCD Board Agenda Item 10, January 18, 2018 [Available at:

http://www.valleyair.org/Board_meetings/GB/agenda_minutes/Agenda/2018/January/final/10.pdf See p.23]

While CARB finds it convenient to employ the District's 2014 survey to mold its 2017 estimate of residential emissions, accepting the District's 2014 residential wood-burning survey as the best evidence for informing a calculation of emissions from residential wood-burning, the District's second, 2017 survey, conducted by the same polling firm employing similar methodology is inexplicably ignored.

Before this Board approves this eleventh-hour revision, the public deserves an explanation as to why the second, 2017 survey isn't being taken into account. That survey clearly shows an *increase* in residential wood-burning by 2017 compared to 2014 and casts doubt on the success of SJV's Rule 4901 in having reduced emissions in fulfillment of even this revised commitment. Submitted to the Clerk of the Board, May 26th, 2020 by Thomas Menz, resident of Fresno County

Comment reiterated at:

<https://docs.google.com/document/d/1zIsodH4CAIrzUfrVj8AijCNtTclB5Gl7xeGOUZOR5Ng/edit?usp=sharing>