

October 21, 2016

Mary Nichols, Chair  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**RE: ARB Action on District's Moderate Plan for 2012 PM2.5 Standard**

Dear Ms. Nichols:

I wanted to take this opportunity to express my gratitude to you, members of your Board, and ARB staff for taking appropriate action on the above matter. Please refer to the attached Board Briefing Memorandum that I just sent to the San Joaquin Valley Air Pollution Control District Governing Board members for further details on how the direction provided by your Board is clearly in line with our preferred course of action. We are especially heartened by your clear direction to prioritize the District's needs for emissions reductions in the 2021-2025 timeframe as a central objective in ARB's Mobile Source Strategy. We stand ready to do our part in leaving no stone unturned in securing additional reductions of directly emitted PM2.5 from stationary sources.

Again, thank you very much for allowing me ample time to share the District's unique challenges and needs with your Board.

Sincerely,



Seyed Sadredin  
Executive Director/Air Pollution Control Officer

CC:

Members of Air Resources Board  
Richard Corey, Executive Officer of Air Resources Board  
Kurt Karperos, Deputy Executive Officer of Air Resources Board

Enclosure

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Madesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



**GOVERNING BOARD**

**Oliver L. Baines III, Chair**  
Councilmember, City of Fresno

**Buddy Mendes, Vice Chair**  
Supervisor, Fresno County

**David Ayers**  
Councilmember, City of Hanford

**Dennis Brazil**  
Mayor, City of Gustine

**John Capitman, Ph.D.**  
Appointed by Governor

**David Couch**  
Supervisor, Kern County

**Bob Elliott**  
Supervisor, San Joaquin County

**Virginia R. Gurrola**  
Councilmember, City of Porterville

**Harold Hanson**  
Councilmember, City of Bakersfield

**William O'Brien**  
Supervisor, Stanislaus County

**Craig Pedersen**  
Supervisor, Kings County

**Alexander C. Sherriffs, M.D.**  
Appointed by Governor

**Hub Walsh**  
Supervisor, Merced County

**Tom Wheeler**  
Supervisor, Madera County

**J. Steven Worthley**  
Supervisor, Tulare County

---

**Seyed Sadredin**  
Executive Director  
Air Pollution Control Officer

---

Northern Region Office  
4800 Enterprise Way  
Modesto, CA 95356-8718  
(209) 557-6400 • FAX (209) 557-6475

---

Central Region Office  
1990 East Gettysburg Avenue  
Fresno, CA 93726-0244  
(559) 230-6000 • FAX (559) 230-6061

---

Southern Region Office  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
(661) 392-5500 • FAX (661) 392-5585

---

**BOARD BRIEFING MEMORANDUM**

**DATE:** October 21, 2016  
**TO:** SJVUAPCD Governing Board  
**FROM:** Seyed Sadredin, Executive Director/APCO  
**RE:** **ARB Action on District's Moderate Plan for 2012 PM2.5 Standard**

Yesterday, the Air Resources Board held a public meeting in Fresno and voted to table action on the District's Moderate Plan for the 2012 PM2.5 Standard. The Air Resources Board also directed ARB staff to return with additional measures to reduce mobile source emissions in the pre-2025 timeline that is critical for the District and to work with us to find additional measures to reduce directly emitted particulate matter from stationary sources.

I testified in support of this action and the ARB vote was unanimous. I believe this action is consistent with your Board's guidance that calls for meaningful measures by the state and federal government to address mobile source emissions and to find ways to avoid unnecessary bureaucratic red tape associated with the antiquated provisions of the Clean Air Act. To keep the momentum going in the right direction, I intend to send a thank you letter to Air Resources Board members along with a copy of this board briefing memorandum. This action was also supported by the Valley's environmental advocates who from the outset were asking for a delay from a narrower point of view relating to their concerns with the limited public process.

As you recall, at our September board meeting when you adopted this plan, we questioned the need for this plan and expressed great frustration with the antiquated provisions of the Clean Air Act that require such a bureaucratic action that does not advance air quality objectives and simply states the obvious that attainment is impossible by the Moderate deadline. We had proposed not to adopt this plan at this time but were pressed by EPA and ARB staff to do so. In fact, at

our last strategy session with EPA and ARB staff on July 26<sup>th</sup> at EPA Region 9 headquarters in San Francisco, we proposed to delay sending this plan and instead combine it with efforts to prepare the District's 5% Plan for the 1997 standard and the Serious plan for the 2006 standard to allow for incorporation of additional control measures and greater opportunity for robust public participation. At that meeting, we were pressed by EPA and ARB staff to instead follow the strict timelines under the Clean Air Act and work on those other plans on a separate track.

In my testimony before the Air Resources Board, I reiterated our frustration with having had to prepare this unnecessary document and also raised concerns with lack of attention by the Air Resources Board to the strict deadlines in 2021-2025 timeframe in their Mobile Source Strategy. I also advocated for crafting climate change measures in a manner that optimizes co-benefits by reducing NOx, particulate, and toxic emissions. I was grateful that the Air Resources Board took these concerns seriously and in tabling action on the plan before them directed ARB staff to return with additional measurable reductions from mobile sources proportional to the overwhelming impact that mobile sources have on the Valley's air quality.

In the coming months, we will work with ARB staff to prepare a plan that meets your Board's objectives including necessary regulatory and incentive-based measures to reduce mobile source emissions. In fact, given the extraordinary time crunch that the Valley faces, we believe that most of the mobile source reductions that are achievable by ARB within this timeframe will have to come from added funding for incentives in the San Joaquin Valley. As directed by your Board, the District is already pursuing a number of measures to reduce directly emitted PM2.5 emissions from stationary sources through our Healthy Soils Initiative, enhanced conservation management practices for agricultural operations, replacement of residential wood burning devices, and development and deployment of new control technologies for under-fired charbroilers at restaurants. We hope to have these measures considered by ARB for inclusion in the plan that is ultimately brought back to the Air Resources Board.