

Nidia Bautista

08-2-3

February 27, 2008

Chair Mary Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 94814

Re: Imperial County Ozone Early Progress Plans

Dear Chair Nichols:

We are writing to convey our comments on the Imperial County Ozone Air Quality Management Plan (AQMP)/State Implementation Plan (SIP).

We understand the Imperial County's Ozone AQMP/SIP is expected to be submitted to US EPA by the end of this calendar year. We are requesting CARB encourage the Imperial County Air Pollution Control District to provide for ample community input – in a similar manner as the South Coast AQMD – possibly including a community advisory committee to inform the development of the plan.

More importantly, we request the CARB Board commit to reviewing the Imperial County Ozone Plan at a public hearing prior to adopting and submitting it to the U.S. EPA.

CARB's mobile-source jurisdiction and oversight authority are important to ensure the region develops its first, and hopefully last, Ozone Plan. As of now, the timeline for submitting the plan seems to leave little breathing room and limits adequate public review to one hearing at the Imperial County APCD. We believe the residents of the Imperial County should have the same opportunities as residents of the South Coast air basin. Therefore, the Imperial County's Plan should not be handled administratively, but instead CARB should commit and plan for a proper public hearing no later than November 2008.

On a separate and related matter, we would like to express our gratitude to CARB staff members Sylvia Oey, Ravi Ramlingam, and Dennis Wade for taking the time to help us better understand the process, timeline and implications of the agenda item for today's hearing regarding Early Progress Plans (EPP) for Imperial Valley Ozone Plan. We were initially concerned that the Early Progress Plan, if adopted, could influence or substitute as the region's Ozone AQMP/SIP, which the region is required to develop under the federal Clean Air Act. In our discussion with CARB staff, we learned that the EPP would be adopted temporarily to allow for the development of transportation conformity budgets for the region. However, the EPP would have no impact or substitute for the region's Ozone AQMP/SIP. We greatly appreciate staff's willingness to meet with us to clarify this matter.

Sincerely,

Nidia Bautista
Luis Cabrales
Coalition for Clean Air

Luis Olmedo
Comite Civico del Valle
Imperial

Monique Lopez, M.A.
Clean Air Initiative –
Imperial County