



San Bernardino Associated Governments

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- San Bernardino County Transportation Commission
- San Bernardino County Transportation Authority
- San Bernardino County Congestion Management Agency
- Service Authority for Freeway Emergencies

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07-7-7

June 21-22, 2007

June 21, 2007

Dr. Robert F. Sawyer, Ph.D., Chairman
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: . PROPOSED STATE STRATEGY FOR STATE IMPLEMENTATION PLAN – OZONE AND PM 2.5 STANDARDS

Dear Dr. Sawyer:

I am writing to you in my role as the President of the San Bernardino County Associated Governments (SANBAG) Board of Directors. My concern is regarding agenda item #07-7-7 which is the consideration of approval of the proposed State strategy for the State Implementation Plan (SIP) for the Federal 8-Hour Ozone and PM2.5 Standards.

The SANBAG Board shares your concern with the negative public health impacts which fine particulate pollution (PM2.5) and 8-hour ozone have on the residents of California. Here in the South Coast Basin (Basin), the efforts of the South Coast Air Quality Management District (SCAQMD) have been extremely effective in reducing the emissions of stationary sources in the Basin. As a result, approximately 80% of the Basin's smog is now caused by vehicles and other mobile sources.

This problem will only be exacerbated by the anticipated tripling of goods movement activity in the next ten to twenty years. Even if the remaining stationary sources were to be shut down, the federal air quality standards for PM2.5, 24-hour PM2.5, and 8-hour ozone would not be met without substantial additional mobile source emission reductions.

On June 1, 2007, the Air Quality Management Plan (AQMP) was approved by the SCAQMD. However, the combination of the AQMP with the California Air Resources Board (CARB) Mobile Source Strategy falls short of demonstrating PM2.5 attainment by 74 tons of NOx per day. The concern I have is regarding the CARB staff proposal to address this 74-ton shortfall. Staff's proposal relies primarily on the elimination of wood burning stoves, with commercial cooking controls and dust control following as secondary mitigation measures.

I would argue that the effect of prohibiting the burning of wood stoves would have virtually no effect on the overall air quality within the South Coast Basin. Since 80% of the Basin's smog is caused by mobile sources, efforts need to focus on reducing the impacts from these mobile sources – trains, trucks, boats and off-road construction vehicles, all of which run on diesel fuel.

A 25% reduction in mobile sources of pollution equals the benefit of a 100% reduction in pollution from stationary sources. Attaining 25% is much more reasonable than eliminating 100% of stationary source emissions.

The SCAQMD has been very effective in reducing pollution over the only sources over which it has jurisdiction—stationary sources of pollution. Now it is time for the CARB and the U.S. Environmental Protection Agency to “step up to the plate” and implement **effective** emissions standards for mobile sources of pollution. The SCAQMD does not have the legal authority to regulate mobile sources of pollution.

Much has been accomplished relative to the improvement of air quality, but we must focus on mobile sources of pollution in order to improve the quality of life for the residents of California. Common sense says that we must address mobile pollution sources.

Thank you for the opportunity to comment. SANBAG looks forward to working cooperatively with the CARB in developing an effective strategy for the SIP to attain federal air quality standards.

Sincerely,

A handwritten signature in black ink, reading "Dennis Hansberger" with a long horizontal flourish extending to the right.

DENNIS HANSBERGER
President, SANBAG Board of Directors