



LATINO ISSUES FORUM A PUBLIC POLICY & ADVOCACY INSTITUTE

Advancing California's Social Economic
and Environmental Future

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Chairman Sawyer and Members of the Board
California Air Resources Board

1001 I St
Sacramento, CA 95812
Facsimile: (916) 323-2393

Re: Comments on 2007 SIP

Dear Chairman Sawyer and Members of the Board:

On behalf of the Latino Issues Forum, we write to express our serious concerns about the proposed 2007 State Implementation Plan (SIP) that will be heard this June 21 and 22. Specifically we request that as a board you delay approval until the staff has significantly strengthened the plan by adding stronger and more immediate measures to clear the air.

Over the years the California Air Resources Board (CARB) has been a nationwide leader in addressing air quality. Unfortunately, *the current plan fails to ensure that the air quality problems plaguing the San Joaquin Valley and South Coast are addressed in an effective and timely fashion.* As a result Californians will continue to pay with their health, natural resources and economic wellbeing.

Today, the San Joaquin Valley and South Coast Air Basins have the most contaminated air quality in the nation. In the San Joaquin Valley, where LIF has worked for seven years to address air quality, air pollution is having a crippling effect on the environment, public health and the regional economy. Each year the externalized cost of pollution to Valley residents reaches an average of \$1000 per person; throughout the region schools lose \$26 million each year as a result of asthma induced absences, and most disturbing, every year there are thousands of asthma attacks and hospitalizations and 1,200 deaths that are attributed to ozone and fine particulate matter.

While the costs of air pollution are felt across the region, low-income communities and communities of color are particularly affected by the regions poor air quality. They are less likely to have access to health care and are more likely to live in neighborhoods with multiple sources of health threatening pollution. In a report published by LIF in 2004, *New Voices for Change: Latino Environmental Health in the San Joaquin Valley*, which surveyed hundreds of working families throughout the San Joaquin Valley, 24 percent of

the residents surveyed reported to not have health insurance for their children, 38 percent are living in proximity to two or more sources of pollution and 27 percent stated that their children were suffering from a respiratory health disease such as asthma.

Despite the staggering impacts air pollution is having on the region, the San Joaquin Valley continues to be in non-attainment status for the 8-Hr Ozone and the PM 2.5 standards. The proposed 2007 SIP does little to ensure that the future of the region that has become known as the "Appalachia of the West," is healthy and prosperous. In fact the current plan will only further exacerbate social and economic disparities by allowing a relatively small section of the population to prosper by polluting, while the public pays with their health, social services and natural resources.

To protect the future of the San Joaquin Valley and of all residents of California we urge you to review and adopt the "Clearing the Air" reports recommendations as well as the following:

1. The State must not bump up the San Joaquin Valley and South Coast Air Basins to Extreme Status.

We are in firm belief that attainment with federal health-based air quality standards can occur long before the 11-year delay (4 year for the South Coast) created by "bumping up" to extreme status. Scientific studies have been produced that can support this achievement, including the recent report prepared by International Sustainable Systems Research Center (ISSRC), "Clearing the Air: How Clean Air is Possible and Affordable by 2013." The recommendations in this report are not only scientifically sound and strong but also feasible. As such there is absolutely no excuse to delay efforts to clean up the nations dirtiest air by bumping to extreme status. If California delays attainment, residents will continue to pay with their health.

2. The State must not rely on "Black Box" measures to clear the air.

It is absolutely unacceptable to rely on undefined measures to clear the air. Previous SIP revisions have relied on "Black Box" measures to reduce ozone. Unfortunately, the reduction commitments made through this process have not come to fruition and these measures have done little to actually reduce ozone. Recognizing the failure of "Black Box" measures, it is critical that CARB adopt strong control measures to ensure attainment under current attainment status.

3. CARB must strengthen Cleaner In-Use Off-Road Equipment and Heavy Duty Truck Rules.

Both of these sources are significant contributors to air pollution throughout California. Given that off-road equipment and heavy-duty trucks are projected to account for a large percentage of NOx and PM 2.5 emissions in the South Coast and San Joaquin Valley, it is critical that CARB strengthen its current rules to achieve additional reductions. For heavy-duty trucks, continuous remote monitoring of On Board Diagnostics systems should be required of all 2010 and later units. We also want to see a SIP commitment to a much more robust on road monitoring and enforcement program for non-OBD equipped heavy-duty trucks.

4. CARB must adopt enforceable reductions for agricultural equipment.

It is completely unacceptable that CARB has not committed to any enforceable reductions from agricultural equipment. Instead, ARB proposes to adopt an inventory that relies on voluntary fleet-turnover to achieve a 72% reduction in NOx by 2023. Experience throughout the San Joaquin Valley and the State has consistently demonstrated that voluntary measures do not work. ARB should not rely on an inventory sleight of hand to achieve such massive "reductions." Rather, ARB should amend the Statewide Strategy to commit to specific reductions now. Waiting for the PM 2.5 plan to decide upon reductions necessary to meet PM 2.5 reduction goals ignores the State's duty to regulate this category as part of the ozone attainment strategy.

Recognizing the tremendous burden air quality is placing on Californians an aggressive, creative and proactive approach to cleaning the air should be embodied in the methods and rules CARB and its districts adopt, including the 2007 SIP. This should include: taking irrigation pumps off of diesel fuel and connecting them directly to the energy grid creating effective enforceable measures to change out heavy duty diesel fleets and electrify truck stops on the I-5 and H-99 in the San Joaquin Valley as Goods movement measures, and working with local governments to strategize on how they transport produce in and out of their communities to create routes that do not pierce the core of the communities. There is too much at stake. CARB must continue to lead the Nation to clear our air and protect public health by strengthening and accelerating the currently proposed 2007 SIP.

We look forward to continue working with staff and the Board in developing a viable plan to achieve clean air. If you have any questions or need additional information about our recommendations please feel free to contact Rey León, Senior Policy Analyst at (559) 241-6572 or via email at rleon@lif.org.

Sincerely,



Chione Flegal
Senior Program Manager



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Senior Policy Analyst