**PM 2.5 Hearing**

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**Fresno-Madera Medical Society**

Thank you for this opportunity to provide input on the PM 2.5 Plan. We have been following the plan and the plan before it and have a great appreciation for the amount of work that has gone into developing such a complex and important plan. The San Joaquin Valley Air District should be commended for their hard work and dedication to protecting public health.

I am here today representing the Fresno-Madera Medical Society’s Air Quality Committee. The following comments are based on information we’ve received from the district as well as other interested stakeholders.

The Fresno-Madera Medical Society represents the views of over 1000 physicians in the Fresno and Madera area. As physicians we are deeply concerned about the health impacts that air pollution has on Valley residents and strive to become part of the solution.

As expressed during the Districts board meeting, we would like to express our support for the proposed plan and also propose a few modifications that may help strengthen the plan. Firstly the:

* Fireplace Rule-We believe the proposed modifications to the rule are a good start. Fireplace soot is very harmful and should be controlled. According the the district fireplaces are the Valley’s largest source of directly-emitted PM2.5 in the winter. The proposed curtailment is absolutely needed.
* For this reason we propose a few modifications to strengthen the rule even further.
	+ Push up implementation date of 2017. For a rule that such as this which will have significant reductions and public health benefits it should be implanted as sooner rather than later.
	+ Consider modeling Sacramento’s tiered system with an added tier that would eventually lead to banning all together.
	+ Expanding season to cover October and March
	+ Couple with a public awareness campaign
* Lawn care rule-We are extremely pleased to see that the district is taking action to address the emissions that come from lawn care equipment which is very harmful to the workers and the public.
	+ Work toward turning the incentive program into an actual rule complete with fines and enforcement
	+ Couple with an educational/training component for large businesses
	+ Continue to secure funding that can be made available to lawn care businesses that want to trade in their old equipment for cleaner equipment.
	+ Invest in research to identify emerging technologies
	+ Banning leaf blowers may also prove necessary at some point
* Charbroiling Rule-We believe this rule to be very important for public health concerns and are glad to see the district is addressing it.
	+ According to the plan the District plans to include controls for under-fired charbroilers in a future iteration of this rule, and is working with SCAQMD to develop new technologies that will make it possible for the regulated community to comply with the new regulations. These efforts are important and necessary.
	+ For this reason the implementation dates should be further evaluated to assess weather implementation can be pushed up to get reductions sooner rather than later.
	+ Banning of charbroiling on bad air days should be considered
	+ In addition, the District could implement controls on under-fired charbroilers now that would provide additional emission reductions. The Bay Area Air Quality Management District (BAAQMD) has implemented controls on new under-fired charbroilers, and controls on existing under-fired charbroilers, this could be mimicked in the Valley to achieve additional reductions.

We urge you to consider and support these reccomendations ensuring the plan is as health protective as possible.

Again, we’d like to thank the district staff and board members for their hard work and dedication to cleaning up the air and we thank you for this opportunity.