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Sep 12, 2021

Chair Randolph and Board members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

*Submitted electronically*

Re: Agenda item 21-9-3: Update on the 2018 PM<sub>2.5</sub> State Implementation Plan for the San Joaquin Valley and Consider a State Implementation Plan Revision for the 15 µg/m<sup>3</sup> Annual PM<sub>2.5</sub> Standard

Chair Randolph and members of the Air Resources Board,

The Central Valley Air Quality Coalition (CVAQ) submits these comments regarding agenda item 21-9-3: Public Meeting to Hear an Update on the 2018 PM<sub>2.5</sub> State Implementation Plan for the San Joaquin Valley and Consider a State Implementation Plan Revision for the 15 µg/m<sup>3</sup> Annual PM<sub>2.5</sub> Standard. The San Joaquin Valley air basin remains the most polluted in the United States for Particulate Matter 2.5 microns or smaller (PM 2.5), evidence that each planning process has fallen short. Words cannot express the profound disappointment in failing to meet the 1997 standard for PM 2.5. Chronic exposure to unhealthy levels of air pollution compromises everyone's immune systems, impacting at risk and frontline populations first and worst. Simultaneously, our communities continue to struggle with the COVID19 pandemic while suffering from extreme weather events connected with accelerating climate impacts such as extreme heat and catastrophic wildfires that only worsen our air pollution problems and health inequities. In the midst of these and other intersecting crises, the proposed plan revisions were pushed through with minimal public process. The long history of failed attainment plans and missed deadlines, along with the deepening inequities in our region and state, warrant our best analysis and solutions. The item before the board -- rushed and based on unsupported assumptions -- is not that.

Any plan revisions must be based on the best available information and commit to substantive new actions and contingency measures that will meaningfully clean the air, particularly for Black and Indigenous Peoples and communities of color as well as those with lower incomes where pollution is concentrated. Therefore, **we request this item be delayed by at least 1 month for further deliberations and discussions on plan improvements.**

To move forward with confidence, CVAQ additionally requests:

- 1) **Updated modeling based on a current and accurate inventory of emissions**
- 2) **Contingency measures**
- 3) **Precursor analysis, particularly NO<sub>x</sub> and ammonia**
- 4) **Oversight and enforcement at stationary sources**

**1. Update the emissions inventory using the more current and accurate EMFAC2017 model.**

- a. Since the plan was passed, CARB has revised its the EMFAC model used to estimate mobile source emissions (EMFAC 2014 versus EMFAC 2017), but CARB is declining to use the revised model to develop a new emissions inventory, which is central to the entire planning exercise. In dissecting what went wrong in the plan's failure to achieve the predicted results, inventory inputs must be reviewed and the latest available data used. That is not only a legal requirement of the federal Clean Air Act, it is also just common sense.

**2. Contingency measures are needed; future commitments are not satisfactory.**

- a. Contingency measures are required, and urgently necessary in an air basin with such a severe problem. The Valley failed to attain the 1997 standards by the prescribed deadline of December 31, 2020. Contingency measures should have already been implemented to provide some immediate emission reductions to Valley residents, but because of the agencies' planning failures and continued resistance to complying with this legal requirement, no measures have been implemented and Valley residents are paying the price.
- b. The apparent strategy of relying on future commitments and unfunded incentive measures provides no assurance of actual emission reductions, no concrete means of enforcing these commitments, and no way to suggest these emission reductions are surplus to the reductions provided by control measures already part of the attainment demonstration.

**3. The precursor analysis should be improved; the role of ammonia should be considered and is under-regulated.**

- a. There are numerous issues with the precursor analysis, including the failure to account for potentially high levels of NO<sub>x</sub> emissions from soil, and the refusal to consider the cost-effectiveness of ammonia controls as compared to NO<sub>x</sub> controls.
- b. Without a valid current and accurate inventory, EPA cannot claim that the 5 percent requirement has been met for NO<sub>x</sub>, PM, or any other precursor.
- c. Compared to NO<sub>x</sub>, which has already been heavily regulated, ammonia has been historically under-regulated and represents the cheapest opportunity for emission reductions.

4. **CARB has not followed through on its promises to increase oversight of stationary sources by auditing compliance at the top PM 2.5 emitters and addressing insolvency in the Valley's ERC program.**
- a. When the combined PM plan was adopted in early 2019, CARB directed staff to undertake 2 additional efforts, 1 being a review of the top 27 stationary sources of PM 2.5; this request has not been acted upon. The 2nd action was a review of the Emissions Reduction Credit (ERC) program managed by the San Joaquin Valley Air District; the review has been completed but fallout from the District's subsequent inability to pass the equivalency demonstration for 2 out of the 6 banks is unresolved. We continue to ask that CARB increase oversight of stationary sources, from permitting to enforcement, and ensure that the biggest polluters are meeting mandated requirements.

Truly improving this plan requires additional time to analyze shortfalls, identify additional sources of direct reductions and control measures, review the best available strategies, and host public engagement opportunities. As noted, the process has moved quickly and while the Valley Air District held one public workshop on this topic, CARB held none. With deadlines for the 2006 and 2012 standards approaching, the San Joaquin Valley urgently needs additional reductions; the health and lifespan of Valley breathers is at stake. Thank you for considering these requests and please contact me if you require any additional information.

Sincerely,



Dr. Catherine Garoupa White  
CVAQ Executive Director

Cc:

Richard Corey, Executive Officer  
Chanell Fletcher, Deputy Executive Officer for Environmental Justice  
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Jaime Callahan, Chair's Chief of Staff  
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