

## **Comment 1 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Art

Last Name: Unger

Email Address: [alunger@juno.com](mailto:alunger@juno.com)

Affiliation:

Subject: San Joaquin Valley 2007 Ozone Plan

Comment:

Dear CARB Board,

I had asthma from age 2 to age 62. I have not had attacks since I started inflammatory pathway blockers ten years ago; about one third of sufferers are as lucky as I was. I doubt air pollution caused my problem. Several studies published in leading Medical journals shows that air pollution might have worsened my problem.

Please come to the aid of those who still suffer asthma and those with heart disease. Do not wait till 2023 to attain NAAQS in the southern San Joaquin Valley. Many of those who suffer asthma there are farm workers who can not find work elsewhere.

Reject the plan as now written and attain NAAQS by 2013. That costs industry more, but saves medical costs and suffering.

Thanks, Art

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-05-30 13:49:09

No Duplicates.

## **Comment 2 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: michael

Last Name: becker

Email Address: mikebe@csufresno.edu

Affiliation:

Subject: (dis)approval of sjvapcd delay tactic

Comment:

Dear CARB Members--

I am pleading with you, in the name of my three year old daughter's health and the health of all children in California's central valley, to reject the San Joaquin Valley Air Pollution Control District's extreme non-attainment/air quality delay tactic. Their actions are not based in law and are immoral. At every turn they have sought to distort, limit, reject, or refuse to implement meaningful strategies for meeting the current 2013 deadline for compliance with clean air laws. The real purpose of the local air board in the central valley is to run interference for big ag and big business. By refusing to require implementation of new generation catalytic converters, they bow to the trucking industry. By refusing to remove all diesel pumps and to make meaningful pesticide regulations, they bow to ag interests. By refusing to implement strict standards on in-use off road heavy equipment, they bow to the construction industry. (In the interest of space I will not continue a long list of similar actions.) In each case they abuse language regarding the "fesibility" of technologies for controlling air pollution in order to save ag and business interests the costs of complying with air quality regulations.

But what are the costs to my daughter's lungs? What is the dollar value of the children who have asthma attacks? Who are hospitalized? Who die?

Please, I am pleading with you, to take a principled stand and protect us from our local air board. They have been negligent. I ask you to be responsible and responsive to the air quality public health crisis that the SJVAPCD largely ignores.

Michael Becker

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-05 10:41:46

No Duplicates.

## **Comment 3 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Melissa

Last Name: Kelly-Ortega

Email Address: melissakellyortega@yahoo.com

Affiliation:

Subject: Take a stand, amend the plan!

Comment:

To Whom It May Concern:

As I read through your CARB introduction on your website, I see that California's Legislature established the ARB in 1967 to:

1. Attain and maintain healthy air quality.
2. Conduct research into the causes of and solutions to air pollution
3. Systematically attack the serious problem caused by motor vehicles, which are the major causes of air pollution in the State.

I find this hopeful after attending the April 30th meeting for the

8-Hour Ozone Plan put forth by the San Joaquin Valley Air Pollution

Control District. This is a flawed plan that will condemn another

generation to the effects of breathing bad air.

On your website, you also mention how air pollution "harms our health" and "harms the economy". Many of us, living in the Central Valley, are depending on YOU to do the right thing. The right thing is - 1. Amend the SJVAPCD's 8-Hour Ozone plan so you actually carry out the job that has been assigned to you, and 2. Replace the current Air Pollution Control Officer with someone who

can carry out the task assigned to the SJVAPCD's APCO. You will find this to be a better public relations campaign than allowing the District to spend \$680,000.00 trying to burnish their image. In other words, you will do more to regain the public's trust by replacing the APCO with someone who actually believes public health is a priority! It is NOT the job of the SJVAPCD to be "customer-friendly" to industry and agriculture. It is the Air District's job to clean the air in the Valley!

Do NOT accept this flawed plan!

Take a stand and amend the plan!

Give hope to the people of the Valley that you actually care about

doing your job to the best of your ability.

Thank you,

Melissa J. Kelly-Ortega

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-11 21:43:28

No Duplicates.

## **Comment 4 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: peggy

Last Name: perkins

Email Address: slivermoon@mac.com

Affiliation:

Subject: air plan delay

Comment:

What happens to good people when they get elected or appointed to a public post? They seem to lose all foresight. This is a phenomenon I have witnessed for a few years now, and I would like to witness it changing. When you think about the decisions you make today, think how they will affect tomorrow. Put all of the factors in place, and think about indecision, delay, and non-commitment. Try your best to avoid having to look back in hindsight. A little foresight goes a long way. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-11 22:03:06

No Duplicates.

## **Comment 5 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Mike

Last Name: Baldwin

Email Address: mike@healthyhousemerced.org

Affiliation: Merced-Mariposa Asthma Coalition

Subject: San Juaquin 2007 Ozone Plan

Comment:

We need to take a little more time to discuss all the possible solutions available to us today to attack this ozone problem. Putting the solutions off until 2024 and counting on solutions that don't yet exist is not in our best interest. I understand business needs but the health of our citizens, including children and laborers and families of businesspeople are more important. Do not approve the plan as it exists today.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-12 08:19:47

No Duplicates.

## **Comment 6 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Josh

Last Name: Daughdrill

Email Address: daughdrill@sbcglobal.net

Affiliation:

Subject: Air Quality

Comment:

We need to approve the San Joaquin Valley 2007 Ozone Plan. Our air quality is abysmal, considered bad not only state but also nationwide. I grew up here, having moved from the smog-filled Inland Empire down south, as my parents believed this area to have better air. It doesn't. I have to watch my middle child use a nebulizer on a daily basis to treat asthmatic symptoms. Delaying any action to systemically address the pollution caused by motor vehicles, including agricultural equipment, the major causes of air pollution in the State, only makes our air worse.

Josh Daughdrill

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-12 09:40:30

No Duplicates.

## Comment 7 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.

First Name: Marilynne  
Last Name: Pereira  
Email Address: marilynnepe@gmail.com  
Affiliation:

Subject: Comment

Comment:

Members of the CALIFORNIA AIR RESOURCES BOARD:

I am extremely concerned about our air quality. I have lived in the San Joaquin Valley of California my entire life and am amazed at the slow pace in which the Air Resources Board has moved on this critical issue. It is my understanding that since the establishment of the ARB in 1967, it should have been monitoring and subsequently moving toward solutions to cleaning up the air quality in the Valley. Research should have been done on the causes, a big part of which we already know is motor vehicles. What research has been done to control their emissions or alternatives to them?

Looking at the rise in asthma cases among residents of all ages but especially children in the San Joaquin Valley, why has the Air Resources Board been so negligent in one of its primary goals to "attain and maintain healthy air quality"?

Knowing that Highway 99 is a major artery in the State highway system running the entire length of the San Joaquin Valley and knowing that motor vehicles are a major cause of air pollution, what have you done to "systematically attack" this problem?

The Central Valley is basically an agricultural valley. We used to be known as the "Bread basket of the World". The only restrictions and regulations I hear about are aimed at ag-related businesses and farmers. While that may be appropriate and timely, what happens when all the farmers are gone because they can't make a living farming but instead can make millions selling their land to developers who will build over the land with more houses, more roads, which will then invite more motor vehicles, which will compound the problem of our air quality further? And you still haven't addressed the largest polluter--motor vehicles!

"In July 1997, the U.S. Environmental Protection Agency (U.S. EPA) promulgated a new 8-hour NAAQS for ozone. U.S. EPA classified the San Joaquin Valley Air Basin as a 'serious' nonattainment area with an attainment date of June 2013." The San Joaquin Valley Air Pollution Control District (District) developed an attainment plan in 2007. The District's analysis of the Ozone Plan showed that the local, State, and federal controls already in place will be insufficient to allow the San Joaquin Valley to attain the ozone standard by the 2013 deadline thus targeting a June 15, 2024 as the "extreme" attainment date. Has our District been asleep at the wheel since 1997? What I see is that by putting off attainment of the ozone standard until 2024, the District is just allowing the problem to expand. We need strong leadership from those who aren't afraid to do something about our air quality NOW!

Pollution-causing businesses should not be approved without tight restrictions. City and County officials should not be able to approve them. Everyone who lives in the San Joaquin Valley needs to take responsibility for our air quality. But those who govern us, those who make decisions for us need to be held accountable.

We depend on you to make the right decisions for our healthy future.

Sincerely,  
Marilynne Pereira

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-12 12:06:49

No Duplicates.

## **Comment 8 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Brent

Last Name: Newell

Email Address: [bjnewell@igc.org](mailto:bjnewell@igc.org)

Affiliation: Center on Race, Poverty & the Environment

Subject: Comments on Proposed Change to Pesticide Inventory for San Joaquin Valley

Comment:

see attached file. Exhibits have been sent by Federal Express to Dr. Robert Sawyer. Exhibits have been sent electronically to Catherine Witherspoon.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/9-6.12.07\\_arb\\_pesticide\\_letter\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/9-6.12.07_arb_pesticide_letter_final.pdf)

Original File Name: 6.12.07 ARB pesticide letter FINAL.pdf

Date and Time Comment Was Submitted: 2007-06-12 15:59:51

No Duplicates.

## **Comment 9 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: LINDA

Last Name: MACKAY

Email Address: IN\_TULES@YAHOO.COM

Affiliation: TriCounty Watchdogs

Subject: SJVAPCD 2007 Ozone Plan

Comment:

I live at the most southern end of the SJVAPCD in Lebec CA. I'm very disturbed by the air district's recent ozone plan to extend the deadline to bring the ozone air pollution levels into attainment by 2024 instead of the earlier date of 2013.

My ten year old daughter, my 90 year old mother, who lives next door to me, and my 4 year old granddaughter who lives in Bakersfield - all belong to the most vulnerable populations when it comes to being impacted by bad air. If you approve this plan you will be subjecting my family to higher probabilities of contracting asthma and other serious respiratory diseases.

I am aware that competent scientists and community leaders have presented the air district with an alternative plan to clean up the ozone much quicker. Why has this alternative plan been ignored??

I know that various industries have put political pressure on the air district to present the state air board with the 2024 extension, but I think that you as our state regulator should consider a plan that would lessen the amount of time that those who are most vulnerable will be exposed to high levels of ozone.

I believe for you to be fair and act responsibly for my family and all of the other families who live within the SJVAPCD - you need to reject the air district's ozone plan and force the district to come up with a faster alternative plan which will reduce respiratory illnesses and premature deaths. That should be your first priority. A delay may save money for industries, but it will destroy people's health.

I appreciate the opportunity to send you my comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-12 20:06:09

No Duplicates.

## **Comment 10 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Catherine

Last Name: Garoupa

Email Address: Catherine@calcleanair.org

Affiliation:

Subject: SJV Ozone SIP

Comment:

As an activist, advocate, and someone who has participated in the Ozone SIP development process, I am very disappointed in the SJV's Ozone clean up plan as it is. We in the Valley are suffering from a health crisis; the very air we breathe is making us sick and costing us each \$1,000 a year - a large sum for many in a region with high concentrations of poverty.

There are concrete solutions available to clean the air faster which have not been included in the District's plan. I urge CARB to amend the plan so that it meets the requirements of the Clean Air Act and works towards the Governor's campaign promise of cutting air pollution in half by 2010. Please take a stand, amend the plan, and demonstrate to the Air District that we need clean air today, not clean air delay!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-13 10:13:50

No Duplicates.

## **Comment 11 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Mary-Michal

Last Name: Rawling

Email Address: [mrawling@gvhc.org](mailto:mrawling@gvhc.org)

Affiliation: Merced/Mariposa County Asthma Coalition

Subject: SJV 8-hour ozone plan

Comment:

Dear Chairman Sawyer and board members,

I would like to urge you to consider the health impacts of the decision before you today regarding the San Joaquin Valley's 8-hour ozone plan. This plan is of great concern to our asthma coalition's members and friends given the 11-year extension to reach this health-based standard. With 1 in 5 children in the San Joaquin Valley suffering from asthma and limited availability of health insurance coverage, our local communities are heavily impacted with the care of over 500,000 Valley residents suffering from this and other respiratory diseases. Economic and emotional distress is felt everyday by our families that must purchase medication to help them catch their breath. We know by way of much scientific research that ozone pollution triggers asthma attacks, leads to the development of new onset asthma, as well breathing difficulties in the general population.

Valley residents including healthcare professionals such as respiratory therapists, nurses, and physicians as well as farmers, business owners, engineers, and parents all came together on April 30th to ask the Valley Air District Board for a better plan that would clean our air sooner.

Those that attended that day were highly disturbed that what seemed like such clear consensus of the public was so overwhelmingly and decisively discounted and ignored by their own leaders.

We now look to CARB for help and hope. Thank you for keeping the needs of the people that live in the San Joaquin Valley foremost in your minds as you consider this plan that will affect them and their livelihoods for the next 17 years.

Sincerely,

Mary-Michal Rawling  
Merced/Mariposa County Asthma Coalition

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-13 10:40:55

No Duplicates.

## Comment 12 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.

First Name: Sarah

Last Name: Sharpe

Email Address: [sarah@coalitionforcleanair.org](mailto:sarah@coalitionforcleanair.org)

Affiliation:

Subject: Air Resources Board Should Direct Staff to Develop Amendments to the SJV Ozone Plan

Comment:

Please see attachment for complete document.

June 13, 2007

Chairman Bob Sawyer  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: Air Resources Board Should Direct Staff to Develop Amendments to the Proposed San Joaquin Valley Air Quality Management Plan for Ozone

Dear Chairman Sawyer:

On behalf of the undersigned organizations, we write to you to seek your support in addressing the San Joaquin Valley's air pollution crisis quickly, effectively, and without delay. We have come a long way over the last few years together, but we can - and should - do much more to reduce air pollution. In 2003, then candidate for Governor, Arnold Schwarzenegger promised the people of California he would cut pollution in half by 2010. Unfortunately, Governor Schwarzenegger won't be able to deliver on that promise unless his administration's Air Resources Board changes course and stands up to the state's polluters in protection of Californians' health. The Draft March 2007 Ozone Plan ("the Plan") for the San Joaquin Valley, one of the two most polluted regions of the state, falls far short of meeting the Governor's promise.

We respectfully ask you to refrain from adopting the Plan at your June 14, 2007 Board meeting, and instead set the Valley on a course to attain the standard in a manner commensurate to the challenge by directing your staff to amend and strengthen the plan.

In recent years, the San Joaquin Valley has made strides in improving air quality. Between 1998 and 2006, the District, the Air Resources Board, Valley residents, industry, the U.S. Environmental Protection Agency, the California Legislature, and public-interest air quality advocates have all taken actions that have collectively decreased the number of days that the Valley violates the health-based National Ambient Air Quality Standard for ozone by 26%. However, we still have a long way to go.

At this rate of improvement, it would take another 23 years to meet the standard. Today, the Valley and the South Coast Air Basin share the distinction of the most ozone-polluted regions in the nation. Furthermore, in the eight years since 1998, the Valley had more violations than the South Coast air basin in seven of those years.

#### THE VALLEY HAS A PUBLIC HEALTH CRISIS

Valley residents know that we have a problem and want to do something about it. A 2006 survey by the Public Policy Institute and the Great Valley Center reported that 43% of northern San Joaquin Valley respondents and 60% of southern San Joaquin Valley respondents called air pollution a "big problem." In addition, 33% of northern San Joaquin Valley respondents and 48% of southern San Joaquin Valley respondents called air pollution a "very serious threat" to them or their immediate family.

An aggressive plan to address ozone pollution will also reduce harmful fine particulate matter (PM2.5) pollution. Oxides of nitrogen (NOx) and volatile organic compounds (VOC) react in the presence of heat and sunlight to form ozone. NOx also reacts with other pollutants to form particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5). Besides violating the ozone standard, the Valley also violates both the health-based 24-hour and annual average PM2.5 National Ambient Air Quality Standards.

The costs that the public bears demand that the Board adopt an accelerated attainment strategy and not defer attainment until 2024. San Joaquin Valley residents would save \$3.2 billion annually in health related costs if the Valley met the health-based ozone and PM2.5 National Ambient Air Quality Standards. This annual \$1,000 per person "pollution tax" does not include unquantifiable costs, such as permanent damage to lung capacity or the inability of asthmatic children to play outdoors on bad air days.

#### WE CAN DO BETTER

Valley residents overwhelmingly support more aggressive actions to improve air quality. In a 2005 Air District survey, 71% of the respondents disagreed with the statement that economic growth and prosperity are more important than environmental issues, 70% disagreed that government standards for pollution are generally too strict, and 67% disagreed that the Air District has been too aggressive in enforcing air pollution regulations on businesses.

On April 30th, over 100 valley residents took time out of their busy schedules to tell the San Joaquin Valley Air District Governing Board that they believe that more can be done. Despite the overwhelming testimony, the Governing Board approved the Plan, which delays attainment of the health-based air quality standards for ozone by 11 years. Arvin and Northwest Fresno would be the last communities to come into compliance with the 8-hour ozone standard in 2024. For more than a year now, Air District staff members have told you and the public that it is not possible to meet the ozone standard any earlier.

However, independent experts with the International Sustainable Systems Research Center (ISSRC) have identified many additional

control strategies within the Air District's authority that will substantially accelerate attainment of the health-based ozone standards. These experts have years of experience addressing complex air pollution problems and providing workable solutions. Dr. James Lents, ISSRC's president, is internationally recognized as a leader in air pollution control science and the former Air Pollution Control Officer at the South Coast Air Quality Management District.

Air District staff previously, and very publicly, claimed that ISSRC's independent plan was wrong. District staff now acknowledge that there are no double-counting errors based on publicly available information. Staff now also admits that when the independent plan adjusts for previously unavailable information, only 3-4 percent of ISSRC's reductions were already accounted for. Nevertheless, the District's APCO, Seyed Sadredin, continues to unfairly and publicly criticize the report for, among other things, substantial double counting errors that his own staff admit do not exist.

The Plan prepared by District staff relies primarily on delaying attainment to 2024 to take advantage of so-called "fleet turnover." In other words, District staff wants to wait as long as possible to allow owners of vehicles to buy newer, cleaner vehicles that emit less NOx. District staff also hopes that the District can obtain billions of dollars in incentive funding to accelerate fleet turnover, but have not secured that funding. As a result, staff wants you to approve a reclassification to "extreme nonattainment" and allocate 52% of all of the needed NOx reductions to the "Black Box," a special loophole in the Clean Air Act designed to allow for future technological breakthroughs. The way staff proposes to use the "Black Box" will not meet Clean Air Act requirements: the Black Box is designed for future technological innovations, not incentive financing shortfalls.

Resorting to an extreme reclassification admits defeat in the battle to clean the air. Reclassification sends a signal to the general public that the state and district have given up. It also reduces pressure on residents, industry, and lawmakers to actively find ways to provide the billions of dollars in incentive funds that will help Valley residents and businesses reduce emissions. Without a near-term deadline, reclassification allows policy-makers to delay much-needed incentive funding.

Moreover, EPA scientists agree that the current 8-hour standard is not as health-protective as may be needed, and the agency may soon propose a tighter, more health-protective 8-hour ozone standard. Without proactive and aggressive action now, the new standard will only be more difficult to meet and Valley residents may never enjoy truly healthy air.

We can do much better. For instance, CLEARING THE AIR recommends that the District strengthen stationary and area source rules to achieve more reductions than proposed by staff. In addition, the District and the Air Resources Board should do much more to address NOx emissions from mobile diesel equipment. In 2005, the largest sources of NOx are (1) diesel trucks (254.4 tons/day); (2) mobile off-road equipment (70.5 tons/day); (3) mobile off-road agricultural equipment (64 tons/day); (4) light trucks and SUVs (28.9 tons/day); and (5) cars (21.8 tons/day).

For mobile sources, we ask that the Air Resources Board strengthen

and accelerate rules addressing the top three categories. Right now, ARB has not proposed a strong rule to reduce NOx emissions from off-road equipment (like construction equipment). In 2014, the proposed off-road rule will produce a mere 8.3 percent reduction (3.7 tons per day from a 44.5 tons per day 2014 inventory). Currently, ARB has not proposed any rule to reduce emissions from in-use mobile agricultural equipment.

We need the Air Resources Board to come to the aid of Valley residents whose local health agency has abandoned them. Their approach forces Valley residents to continue to breathe dangerous, polluted air until owners of these highly-polluting diesel engines voluntarily buy new equipment, ideally with some incentive funding to prod them along.

Instead, we advocate that you amend the District's proposed plan to include a Clean Air Days rule. This rule is best described as a carrot and stick approach. The Valley could clean up dirty diesel engines much faster by phasing in operational limits on the oldest and most polluting diesel equipment. This process could be coupled with financial incentives to operators to replace this out-dated equipment or to use cost-effective retrofit technologies to reduce their emissions. After five years, a Clean Air Days rule would require reasonable guidelines on extreme diesel polluters who choose not to develop a cleaner fleet. Ultimately, after being given several years and, possibly, financial assistance, businesses that want to continue to use dirty diesel equipment would not be allowed to use that equipment on days when District scientists forecast that air quality will be poor. By 2013, when Clean Air Days would be implemented, experts estimate only thirty days a year would be subject to Clean Air Days.

The District currently requires the general public to refrain from using wood-burning fireplaces on high pollution days in the winter. The general public is also required to submit their automobiles to smog check and bring their vehicles up to a tailpipe emissions standard. It is fair and consistent to require that owners of dirty diesel engines curtail their pollution on bad air days. If those engine owners choose not to avail themselves of publicly provided incentive funds to retrofit or replace dirty engines, then they should have no right to continue to pollute the air that we all share.

#### WHAT CAN THE AIR RESOURCES BOARD DO?

The Valley's bad air is a public health, public relations, and economic disaster. The region cannot expect to attract high-paying jobs that retain an educated workforce if people around the country know the Valley's air is among the most polluted in America. The Board has an opportunity to set the Valley on a course for clean air by requiring ARB staff to amend the plan and present the Board with a real roadmap to clean air by 2017.

The California Air Resources Board should not adopt the proposed 2007 Ozone Plan at the hearing on June 14, 2007. The June 15, 2007 deadline to submit the Plan to EPA is a paperwork deadline. Assuming EPA takes any action at all, if ARB does not submit an attainment plan by June 15th, EPA could make a finding of failure to submit, which gives ARB 18 months to submit a plan before any sanctions would take effect. A decision to tell staff to develop a better plan carries no negative consequences.

Therefore, the Air Resources Board should:

1. Direct ARB staff to amend the current plan to a "severe" plan that meets Clean Air Act requirements, controls both mobile and stationary/area-wide sources to the fullest extent possible, and attains the 8-hour ozone standard by 2018, at the latest.
2. Eliminate the use of the "black box". It's been a box full of empty promises that has failed Californians for 20 years.
3. Among other controls that ARB staff should consider and adopt is a Clean Air Days rule for mobile diesel sources of NOx emissions. Clean Air Days will rely on operational limits and could be coupled with incentive funding to clean up dirty mobile diesel equipment. After several years, owners of dirty diesel engines who choose to not replace that equipment will be prohibited from operating on Clean Air Days.
4. Air Resource Board should commit to specific measures to strengthen and accelerate rules addressing in-use mobile agricultural equipment. Currently, ARB has not proposed any rule to reduce emissions from in-use mobile agricultural equipment in their proposed State Implementation Plan.

#### CONCLUSION

We can and must do better. This is an important opportunity for all of us to work together to deliver that which Valley residents want and need: cleaner air as quickly as possible. We need ARB to step in and step up to ensure the Governor is able to deliver on his promise to the people of California and to ensure the people of the Valley that they will breathe cleaner air before 2024. Thank you for your time, dedication, and service on the California Air Resources Board.

Sincerely,

Candice Adam-Medefind  
Mom's Clean Air Network (Mom's CAN)

Diane Bailey  
Natural Resources Defense Council

Michelle Garcia  
Program Director  
American Lung Association of California

Kevin Hall, Air Quality Chair  
Sierra Club -Tehipite Chapter

Kevin Hamilton and David R. Pepper, MD, MS  
Medical Advocates for Healthy Air

Linda McKay  
Tri-County Watchdogs

Mary-Michal Rawling  
Merced/Mariposa County Asthma Coalition

Betsy Reifsnider  
Environmental Justice Project  
Catholic Diocese of Stockton

Sarah Sharpe  
Coalition For Clean Air

Kyle Stockard and Marilynne Pereira  
Merced Stop Wal-Mart Action Team

Central Valley Air Quality (CVAQ) Coalition Steering Committee:

Jose Carmona  
Center for Energy Efficiency and Renewable Technology

Teresa De Anda  
Comité para el Bienestar de Earlimart

Caroline Farrell  
Center on Race Poverty and the Environment

Susan Frank  
Kirsch Foundation

Tom Frantz  
Association of Irritated Residents

Sarah Jackson  
Earthjustice

Rey León  
Latino Issues Forum

Rosenda Mataka  
Grayson Neighborhood Center

Erin Rogers  
Union of Concerned Scientists

Carolina Simunovic  
Fresno Metro Ministries

Arthur Unger  
Sierra Club

cc: California Air Resources Board Members  
Catherine Witherspoon, Executive Officer, Air Resources Board  
Seyed Sadredin, Air Pollution Control Officer, San Joaquin Valley  
Unified APCD  
Senator Dean Florez, Chair, Senate Select Committee on Air Quality  
in the San  
Joaquin Valley  
Member Juan Arambula, California Assembly

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/14-sjv\\_sip\\_letter\\_to\\_carb\\_final.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/14-sjv_sip_letter_to_carb_final.doc)'

Original File Name: SJV SIP Letter to CARB FINAL.doc

Date and Time Comment Was Submitted: 2007-06-13 10:50:36

No Duplicates.

## **Comment 13 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Thomas

Last Name: Grave

Email Address: tgrave@sbcglobal.net

Affiliation: Merced Alliance for Responsible Growth

Subject: SJVAPCD Ozone Compliance

Comment:

The Merced Alliance for Responsible Growth wishes to go on record as strongly opposed to the Air Pollution Control District's recommended extreme non-attainment status for the 8-hour EPA ozone standard. At stake is the health and well-being of our citizens. It is irresponsible to contend that for reasons of impracticality and expense we must defer ozone compliance until 2024. Strategies and technologies are available now to greatly reduce ozone in the Valley and reach compliance by a much earlier date. If a plan to defer to 2024 is adopted, we are concerned that the pressure will be off all of us--residents, businesses and legislators--to attack the ozone problem with the resolve that is warranted under these dire circumstances.

Would we tolerate a similar situation with regard to the water we drink?

Will talented workers and their families be attracted to high-paying jobs in the Valley if our air remains so compromised?

We urge the Air Resources Board to reject the San Joaquin Valley Air Pollution Control District's 2024 compliance proposal at the CARB meeting on June 14, 2007.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-13 11:26:16

No Duplicates.

## **Comment 14 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Jim  
Last Name: Wells  
Email Address: jwells@esgllc.net  
Affiliation:

Subject: SJV 2007 Ozone Plan  
Comment:

Please see attached.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/16-arb\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/16-arb_letter.pdf)'

Original File Name: ARB Letter.pdf

Date and Time Comment Was Submitted: 2007-06-13 11:42:55

No Duplicates.

## **Comment 15 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Lisa

Last Name: Kayser-Grant

Email Address: lkgrant3@earthlink.net

Affiliation: Moms Clean Air Network (Moms CAN)

Subject: Amend or Reject SJV 2007 SIP

Comment:

Dear Air Resources Board Members,

We in the San Joaquin Valley have waited long enough for effective, progressive action to clean our air. Now the Valley Air Board is proposing an unconscionably long delay in cleaning ozone. They and you have been presented with credible scientific research and legal arguments as well that fully support a plan that will clean ozone in the Valley years sooner, and without the "black box" escape clause. This is well documented in the "Clearing the Air" report by the the ISSRC and by other sources including the air pollution specialist who resigned from the Valley Air District after it ignored his and others' findings that ozone attainment could be reached before 2023 and without the "black box". All that is needed to implement such a plan is the political will to respond to those to whom you are responsible: the breathers of this valley. Please place the highest priority on achieving clean air in the San Joaquin Valley as soon as possible, not as soon as comfortable for the polluting parties.

Lisa Kayser-Grant

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-13 11:43:13

No Duplicates.

## Comment 16 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.

First Name: Nidia  
Last Name: Bautista  
Email Address: [nidia@coalitionforcleanair.org](mailto:nidia@coalitionforcleanair.org)  
Affiliation: Coalition for Clean Air

Subject: SJV Ozone Plan - No-constraints Analysis

Comment:

June 8, 2007

Chairman Bob Sawyer  
California Air Resources Board (ARB)  
1001 "I" Street  
Sacramento, CA 95814

Re: San Joaquin Valley Air Quality Management Plan for Ozone  
No-Constraints Analysis

Dear Chairman Sawyer:

We write to express our deep concern with the current San Joaquin Valley proposed attainment plan for ozone and its no-constraints analysis. We believe the San Joaquin Valley Air District's assertion (which is based on their no-constraints analysis) that it is impossible to get to clean air without the 'black box' may be inaccurate and deserves more analysis.

We understand that a no-constraints analysis looks at control options from the viewpoint that cost is not a consideration and is intended to provide insight into the potential to reach clean air. After reviewing both analysis conducted by the ARB on heavy duty trucks for the San Joaquin Valley and the independent International Sustainable Systems Research Center (ISSRC), we have serious concerns that the San Joaquin Valley Air Pollution Control District's analysis is flawed.

Specifically, Chapter 7 of the SJV Plan says the no-constraints inventory for 2020 for HDD trucks is 63, while ARB is 43 tons per day. You can recreate the district's number when you use grams per vehicle emission rate for a new vehicle and apply it to the entire of number of vehicles in the fleet, thereby inadvertently increasing the Vehicle Miles Traveled (VMT) significantly. We believe the correct approach is to take the grams per mile emission rate for a new vehicle and apply it to the total VMT in the area. The ARB approach confirms this approach (ARB results are 43 t/d and the independent researchers at ISSRC calculates 48 t/d because ISSRC emission factors are more conservative). Therefore, we believe the ARB methodology confirms the validity of the ISSRC methodology and confirms the flaw in the SJV District's no-constraint analysis.

The table below shows the results of the ARB, SJV and ISSRC calculations, illustrating that the district overestimates the emissions achievable by approximately 30 tons/day from just three categories in 2020. The difference is even more significant if an earlier year is modeled and other sources are reviewed.

2020 No Constraints Emissions Calculation (tons/day)  
Source Category CARB1 District2 ISSRC  
Heavy Duty Trucks 43 63 48  
Passenger Vehicles & MDT 5 13 5  
Farm Equipment 9 13 9  
Total Difference from these three categories -32 -- -27  
1The CARB analysis can be found on page 128 of their January  
draft SIP.  
2The District analysis can be found in C of their proposed SIP.

The implications of this miscalculation are significant. The District staff has indicated that it would be impossible to get to attainment at any time based on their no-constraints analysis. However, if the ARB values were replaced by their calculations, this no constraints inventory shows that it is possible to get to or very close to attainment in 2017 or any year after. The full ISSRC analysis shows that an overall no constraints analysis can get in attainment in 2013 or any year after.

We understand that this information has been presented to the ARB staff as well as the District on several occasions over the last two months. The ARB staff has agreed that the methodology used by the District is in error.

We want to ensure this information is brought to the attention of the ARB board members. We hope that it is helpful in determining that additional time is needed to further analyze the SJV AQMP for ozone in the hopes attainment of the federal health-based standard can be achieved much sooner than 2024 as is currently being proposed.

Sincerely,

Tim Carmichael  
Coalition for Clean Air

Paul Cort  
Earthjustice

cc: ARB board members

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-13 11:58:19

No Duplicates.

## **Comment 17 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Rich

Last Name: Fowler

Email Address: Non-web submitted comment

Affiliation: Catholic Charities

Subject: SJV APCD's Proposed Ozone Plan

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/28-sjvsip07-17.pdf>'

Original File Name: sjvsip07-17.pdf

Date and Time Comment Was Submitted: 2007-06-25 13:21:15

No Duplicates.

## **Comment 18 for 2007 San Joaquin Valley SIP (sjvsip07) - Non-Reg.**

First Name: Maureen

Last Name: McCorry

Email Address: mccormyk@yahoo.com

Affiliation:

Subject: San Joaquin Valley 2007 Ozone Plan

Comment:

I urge the vote to reject the San Joaquin Valley Air District Board's recommendation.

Family photos and slides bear witness to a view of the Sierra mountains from my parent's home during that was breathtaking. That was then, this is now. Born and raised in Merced County, I left when I was eighteen. I have recently relocated back to the Merced area to a fundamentally transformed Valley; what a difference 28 years can make.

I have returned to a Valley that is now distinguished as one of the most polluted regions in the nation. If the wind is whipping through the Valley, I might have a chance to view what I took for granted growing up in the 1960's in Eastern Merced County.

I can remember the one child on our campus who had asthma. Today, an asthma diagnosis has become a routine event. My mother suffers from chronic asthma which has only worsened with age. Today, it is commonplace for one third - one -half of students to carry inhalers on local campuses.

Diesel trucks with outdated systems continue to clog Highway 99 and Highway 5. The former agricultural communities in the Northern and Western counties have been converted into bedroom communities.

We have not begun to address a truly sustainable model for Valley residents.

While I acknowledge the economic need to move goods and services and the need for folks to find decent jobs and affordable housing, our population and our quality of life continues to suffer. We can't continue under "a business as usual" mentality and try to sweep these problems under the rug until 2024.

Please take a stand with the governor and help to reduce pollution now -- we can not afford to wait another 15 years.

Sincerely,  
Maureen McCorry

151 E. 27th Street  
Merced, CA 95340

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-25 13:23:22

No Duplicates.

**Comment 1 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Paul

Last Name: Cort

Email Address: Non-web submitted comment

Affiliation: Earth Justice

Subject: CA SIP Revisions: 2007 San Joaquin Valley SIP

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/21-sjvsip07-ws-1.pdf>

Original File Name: sjvsip07-ws-1.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:29:02

No Duplicates.

**Comment 2 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Penny

Last Name: Primo

Email Address: Non-web submitted comment

Affiliation: American Lung Assoc. of CA

Subject: Comments on 2007 SIP

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/22-sjvsip07-ws-2.pdf>

Original File Name: sjvsip07-ws-2.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:31:29

No Duplicates.

### **Comment 3 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Seyed

Last Name: Sadredin

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: The District's 2007 Ozone Plan

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/23-sjvsip07-ws-3.pdf>

Original File Name: sjvsip07-ws-3.pdf

Date and Time Comment Was Submitted: 2007-06-25 11:04:33

No Duplicates.

## **Comment 4 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Brent

Last Name: Newell

Email Address: Non-web submitted comment

Affiliation: Center on Race, Poverty, & the Envir.

Subject: CA SIP Revisions: 2007 San Joaquin Valley SIP

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/24-sjvsip07-ws-4.zip>

Original File Name: sjvsip07-ws-4.zip

Date and Time Comment Was Submitted: 2007-06-25 11:15:25

No Duplicates.

## **Comment 5 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Sarah

Last Name: Sharpe

Email Address: Non-web submitted comment

Affiliation: Coalition for Clean Air

Subject: Form Letter

Comment:

Please see the attached comment; approx. 50 letters received.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/25-sjvsip07-ws-5.pdf>

Original File Name: sjvsip07-ws-5.pdf

Date and Time Comment Was Submitted: 2007-06-25 12:47:40

No Duplicates.

## **Comment 6 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: John

Last Name: Grant

Email Address: Non-web submitted comment

Affiliation:

Subject: Profiles in Discourage

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/26-sjvsip07-ws-6.pdf>

Original File Name: sjvsip07-ws-6.pdf

Date and Time Comment Was Submitted: 2007-06-25 12:48:42

No Duplicates.

## **Comment 7 for 2007 San Joaquin Valley SIP (sjvsip07). (At Hearing)**

First Name: Nidia

Last Name: Bautista

Email Address: Non-web submitted comment

Affiliation:

Subject: Summary of Top 3 Suggestions for Accelerating Clean Air for the SJV

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sjvsip07/27-sjvsip07-ws-7.zip>

Original File Name: sjvsip07-ws-7.zip

Date and Time Comment Was Submitted: 2007-06-25 12:50:37

No Duplicates.