



**The Roman Catholic
Diocese of Fresno**

September 30, 2018

Mr. Samir Sheik
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: San Joaquin Valley Integrated PM2.5 Attainment Plan

Dear Mr. Sheik,

On behalf of the undersigned community health, environmental, environmental justice, and faith groups and outside the San Joaquin Valley, we present the following comments on the San Joaquin Valley Air Pollution Control District's (Air District) Draft 2018 Plan for the 1997, 2006, and 2012 federal standards for particle pollution that is 2.5 microns or smaller (PM2.5) (Draft PM2.5 Plan). Our comments concern stationary and area sources of pollution under which the Air District has regulatory control. Comments regarding mobile sources will be directed to the California Air Resources Board (CARB), with the Air District copied.

The San Joaquin Valley has the worst PM2.5 pollution in the nation, with 24-hour and annual ambient air concentrations frequently in excess of federal health standards. PM2.5 pollution causes a range of significant, adverse health effects, including asthma attacks, heart attacks, heart disease, and premature death. Poor air quality keeps residents indoors, restricts outdoors activities, and leads many to leave the Valley due to health concerns. Poor air quality also impacts the environment, including negative impacts to the air, biome and visitors of Yosemite, Sequoia, and Kings Canyon National Parks.

The Clean Air Act provides that each state with a region in nonattainment of the federal standards must adopt a plan for improving air quality. The Clean Air Act further requires attainment be achieved "as

expeditiously as practicable.” We believe the Air District’s Draft PM2.5 Plan could be improved, and thus attainment practicably expedited. We propose the implementation of the following pollution-reduction recommendations in effort to achieve expeditious attainment of the federal health standards for PM2.5. Thank you in advance for considering our comments.

Reduce Residential Wood Burning:

- Reduce residential wood-burning threshold to 12 ug/m³ for all wood-fired combustion devices in the San Joaquin Valley, including EPA-certified devices;
- Release a multi-pronged, multilingual advertising campaign to educate the public on the health impacts of wood smoke;
- Develop a program to connect low-income residents with energy-related financial resources;
- Extend no-burn season timeframe to October 1 - March 31st;
- Increase enforcement, especially at night;
- Only provide incentives for natural-gas or non-portable electric heaters;
- Require wood burning devices, included EPA-certified devices, to be converted to gas or permanently disabled at the time real estate changes hands; and
- As a contingency measure, ban all non-essential burning.

Reduce Agricultural Burning:

- Streamline and coordinate federal, state and local incentive programs for sustainable agricultural practices;
- Increase the cost of an agricultural burn variance to \$800 - \$1,000 an acre;
- Use funds from variances to provide a \$200-an-acre incentive for farmers to mulch, incorporate, and/or compost wood waste;
- Require agricultural burning to follow the 12 ug/m³ residential wood-burning restrictions;
- Do not allow burning on days during - or directly proceeding - rain events;
- Increase enforcement during peak PM2.5 season and during exceptional events; and
- No longer offer political or economic support to the biomass industry.

Under-Fired Charbroilers:

- Require large under-fired charbroilers to install pollution control devices by 2024.
- Require pollution control devices on all new, large under-fired charbroilers; and
- Increase outreach and incentives for pollution control devices.

Address Emissions from Oil & Gas:

- Require all new oil and gas operations use solar-powered steam generators and boilers; and
- Include small unpermitted sources and small producers in all existing oil and gas rules.

Target Heavy-Duty Freight:

- Target mobile source incentives and enforcement in the most overburdened communities, especially around distribution warehouses located in/near residential areas; and

- Air District and CARB partner on mobile source enforcement.

Evaluate Ammonia-Reduction Strategies:

- Thoroughly evaluate the feasibility and costs of strategies to further reduce ammonia.

We believe the above pollution-reduction policies will lead to attainment of PM2.5 standards at faster pace than the current Draft PM2.5 Plan. For this reason, we believe the Air District should implement the above measures.

Sincerely,

Dolores Barajas-Weller
Central Valley Air Quality Coalition

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Central California Asthma Collaborative

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Central California Environmental Justice Network

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CC: Richard Corey, California Air Resources Board