

**Access Fund * Central Valley Young Environmental Advocates
Coalition to Protect America's National Parks * National Parks Conservation Association
Outdoor Alliance California**

June 13, 2022

Liane Randolph
Chair, California Air Resources Board
1001 I St.
Sacramento, CA 95814

Comments submitted via California's system: ww2.arb.ca.gov/applications/public-comments

Re: Comments on California's Proposed State Implementation Plan Regional Haze Round Two

Dear Ms. Randolph,

On behalf of the undersigned organizations, we respectfully submit this comment letter on California's Regional Haze State Implementation Plan for the Second Implementation Period (RH SIP). As you know, the regional haze program is a time-tested, effective program that has provided real, measurable and noticeable improvements in national park visibility and air quality across the country. The Second Implementation Period affords states the opportunity to continue improving air quality in not only our national parks and wilderness areas, but in our communities and cities across the country.

Californians are familiar with hazy air. Far too often, our summers are ruined by smoke-filled skies and our winters inundate California communities with some of the worst particulate pollution in the nation. This pollution shrouds our state in visibility impairing haze and drives people indoors and to emergency rooms. While not all of this pollution can be immediately prevented, the state should eagerly embrace any opportunity to limit harmful pollution that worsens haze pollution.

Unfortunately, we believe that the California Air Resources Board (CARB) has proposed a do-nothing regional haze plan for the Second Implementation Period, missing a key opportunity to reduce air pollution in the state. By requiring nothing of major industrial pollution sources for this planning cycle, and instead kicking the can to the next planning cycle, CARB is failing Californians and the millions of people who visit our state each year to enjoy our incredible outdoor resources.

Moreover, the pollutants at issue for the regional haze program are also harmful to public health, especially communities living near the state's numerous oil refineries, cement manufacturing facilities, and other industrial sources. We hope you will consider our below recommendations for improvements to the RH SIP before submitting it to the U.S. Environmental Protection Agency (EPA).

Recommended Improvements to California's Regional Haze SIP

Looking only at nitrogen oxides (NO_x) pollution, CARB staff identified 42 industrial point sources as impairing visibility in California and neighboring states. Of those 42 sources, staff selected only a single pollution source for a more thorough 4-factor analysis of emission-reducing measures and subsequently determined that no new reductions in emissions are warranted.

We are encouraged to see CARB's inclusion of analysis of mobile sources in the RH SIP as no other state did this and we recommend that in addition to integrating onroad requirements, the state should also include and make enforceable offroad requirements. Additionally, we are deeply concerned that no new pollution controls are required for the dozens of industrial sources of haze in the state. These decisions mean that thousands upon thousands of tons of preventable sulfur dioxides (SO₂) and NO_x will continue to pollute California's air for the next decade. We believe this is unacceptable and recommend CARB implement the following improvements to the plan prior to submission to EPA:

1. Investigate and require controls for all human-made haze forming pollutants, including sulfur dioxides.
2. Fully evaluate through a 4-factor analysis the major industrial sources of haze identified by the state so that federal land managers and the public can understand the impacts of those facilities on visibility.
3. Require cost-effective and federally enforceable emissions controls for the identified sources upon a proper review.
4. Thoroughly assess the environmental justice impacts of the RH SIP.

We believe that if the state's plan is left unchanged, it will not comply with the Federal Clean Air Act and the EPA's Regional Haze Rule as it does little to limit haze-causing air pollution and fails to help restore naturally clean air. Please do not overlook this once-in-a-decade opportunity to not only preserve viewsheds in our parks and public lands, but also to protect the health of everyday Californians across our great state.

Sincerely,

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