

Comment Letter #45

Email to South Coast AQMD re Draft 2022 AQMP

19 June 2022

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Hello,

Susan Shelley penned an editorial captioned REGULATORS TILT AT WINDMILLS which was published in the Sunday 12 June 2022 issue of the Long Beach Press Telegram. Such op-eds tend to polarize the extremes and are usually not unifying. I am open-minded. I read your Air Quality Management Plan (AQMP) 2022 Executive Summary and Overview and have conducted limited additional research. I hope you can assist with answers and consider my views.

I was born/raised in CA and have lived in Long Beach, CA continuously since 1986. I have a distinct memory of air quality in 1986, when there were many days the Long Beach skyline from the top of the Gerald Desmond Bridge was not visible due to smog. This is not the case now (and has not been for many years) and my experience echoes the following copied from your AQMD 2022 Overview:

Improvements in cleaner technology and strict regulations have reduced ozone levels since its peak in the mid-twentieth century.

The Overview continues as follows:

However, ozone levels have remained unacceptably high over the past decade despite significant reductions. This trend is due to the changes in climate and other weather conditions such as the increase in hot, stagnant days that can lead to the formation of ozone that we have experienced in recent years

I do not know what the “mid-twentieth century” is but if interpreted literally it was before 1986. What is indicated is ozone levels hit a peak, reduced since the peak, and then over the past decade have remained “unacceptably high” despite significant reductions due to “climate and other weather conditions.” This is confusing – too much is stated with too little explained:

- When did ozone levels peak and what were ozone levels at the time of the peak?
- What was the goal ozone level between when ozone levels peaked and ten years ago?
- Between when ozone levels peaked and ten years ago, was the goal ozone level ever met?
- Have “high” ozone levels caused climate change, or has climate change caused “high” ozone levels.

Now, nitrogen oxides (NO_x) – the key pollutant that creates ozone – will need to be reduced by 71% by 2037 to meet adopted rules and regulations, even though NO_x emissions are expected to decline by nearly 36 percent from 2018 to 2037. Somehow through “air quality modeling” and a host of other techniques which, to the uninitiated such as myself are too mystical to understand, you can now determine that in 2037 in your South Coast Air Quality Management District area of operation (western portions of Riverside and San Bernardino Counties, the southern two-thirds of Los Angeles County, and all of Orange County–area covers 6,729 square miles out of California’s total of 163,696 square miles and is home to more than 40 percent of California’s population)

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42 percent of NOx emissions will come from federal sources

39 percent will come from State regulated sources

19 percent will come from South Coast AQMD regulated sources

Thus the federal government and state of California have responsibility for about 81% of the pie. South Coast AQMD has jurisdiction over the remaining 19% of the NOx emitters which you have referred to as “stationary sources – such as power plants, refineries, and factories”. These “such as” sources seem to be reasonable targets for reasonable standards...but there apparently are other stationary sources not named in your *such as* examples. Your overview goes on to explain:

The magnitude of such an emission reduction (the 71% beyond that which will be achievable through current programs in 2037) means that **all sources of emissions** must be controlled as stringently as possible...

The *all sources of emissions* sounds like it encompasses those sources subject to federal and state jurisdiction and South Coast AQMD’s *named* and **unnamed** stationary sources. All of this evokes a series of additional questions.

- Have federal/state emissions control goals been met?
- If YES, did federal/state authorities implement measures different than South Coast AQMD measures and, if so, what were said measures and if they could have been implemented by South Coast AQMD and were not, why were they not implemented?
- What were South Coast AQMD ozone levels in the years 2001, 2010, 2011, and 2020? These answers will reveal decade-long changes:

2001 ozone level - 2010 ozone level = change occurring during 1st decade

2011 ozone level - 2020 ozone level = change occurring during 2nd decade

- Over the decades 2001-2010 (1st decade) and 2011-2020 (2nd decade) what were the total South Coast AQMD area ozone levels changes attributable to:

Federal regulatory action: (EPA Δ)

State regulatory action: (CA Δ)

South Coast AQMD regulatory action: (SCAQMD Δ)

For each decade, ozone level change occurring during the decade = EPA Δ + CA Δ + SCAQMD Δ

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- What were the total costs (i.e., permits, expenses to upgrade, penalties and fees such as cap-and-trade credits, etc.) incurred by regulated entities to comply with

1st decade EPA Δ :

2nd decade EPA Δ :

1st decade CA Δ :

2nd decade CA Δ :

1st decade SCAQMD Δ :

2nd decade SCAQMD Δ :

- What were the 2021 ozone levels and what are the projected 2037 ozone levels?
- Of the 2021 ozone levels and projected 2037 ozone levels, what amounts were from/are projected to come from:

Federal sources 2021:

Federal sources 2037:

State sources 2021:

State sources 2037:

South Coast AQMD sources 2021:

South Coast AQMD sources 2037:

- Of the 2021 ozone levels and projected 2037 ozone levels emitted/projected to be emitted from South Coast AQMD sources, what amounts are attributable to:

Power plants 2021:

Power plants 2037:

Refineries 2021:

Refineries 2037:

Factories 2021:

Factories 2037:

- For 2021 and 2037

ozone levels from South Coast AQMD sources (SCAQMD Δ) - ozone levels from power plants - ozone levels from refineries - ozone levels from factories = ozone levels from unnamed stationary sources (SCAQMD Δ 2021X and SCAQMD Δ 2037X)

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- What other unnamed stationary sources (sources besides power plants, refineries and factories) will South Coast AQMD be regulating to address SCAQMD Δ 2021X and SCAQMD Δ 2037X, and what amounts of NO_x emissions were/will be emitted from each?

Susan Shelley's article relays South Coast AQMD has already regulated power plants, refineries and factories, and now is looking at regulating "residential combustion", which reportedly accounts for only a fraction of a fraction of NO_x emissions, by requiring the replacement of gas water heaters, furnaces and stoves in up to 5.3 million residences. She also noted, and I think this is the crux of the matter, that decision-making seems driven by federal (EPA) requirements which appear to be impossible to meet.

It seems like insanity to impose a standard impossible to meet and, in lieu of a monetary penalty or shut-down order offer a power plant, refinery, or factory a "mitigation fee" (which sounds like "cap and trade" by another name) and then use it to entice home dwellers to dump natural gas appliances and go green with zero emissions electric appliances. Notwithstanding that we already have a perilously fragile electric infrastructure that seems not to be upgrading as fast as EV's and charging stations are being built, if SCAQMD Δ 2021X and SCAQMD Δ 2037X happened to be a significant contributor of emissions this could be a sound program...but it appears SCAQMD Δ 2021X and SCAQMD Δ 2037X represent infinitesimal amounts.

Subsidizing residents to dump natural gas appliances would result in minuscule environmental improvement (and is not justified). Additionally, a "mitigation fee" would end up on a power plant, refinery, or factory financial balance sheet somewhere as an expense (as is cap and trade) and be factored in to its pricing. A "mitigation fee" is not free money, but instead a cost of business such as regulatory compliance, which with all other costs, determines the price of a product (and in today's climate adds to inflation).

My sense is South Coast AQMD faces a mandatory impossible-to-meet federal standard and is looking at all options. If orchestrating "mitigation fees" on those who simply cannot emit less to fund free or subsidized appliances to make it look like doing something is better than doing nothing, even if it will not accomplish meaningful change, please change your course.

I am trying to be reasoned and not negative. This does not make sense...and a bee is not a fish.

Don't take away my propane BBQ! If you need to pursue something go after something else such as bovine, swine and equine flatulence. I'll be happy to grill veggie burgers and fish (but not bees).

Sincerely,

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