

# **Why States Care** *Implementation & Impacts of a NAAQS*

**Workshop on Ozone NAAQS**  
**Science and Policy**

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# The San Joaquin Valley

- 4.2 million people with high growth rate
  - 4.7 million by 2020
- 27,000 farms, 7 of 10 highest ag-producing counties in nation
- 80% of CA oil production
- State's 2 major trade corridors
- Non-Attainment Status
  - Ozone - Extreme
  - PM2.5 - Serious



# What if a region did all of these?

- ✓ Toughest air regulations on stationary sources (600 rules since 1992)
- ✓ Toughest air regulations on farms and dairies
- ✓ \$40 billion spent by businesses on clean air
- ✓ Over \$1 billion dollars of public/private investment on incentive-based reductions
- ✓ Toughest regulations on cars and trucks
- ✓ Toughest regulations on consumer products
- ✓ Reduced emissions by 80% - *but need another 90% reduction in emissions just to meet a standard that will soon be replaced with an even tougher standard*



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# New NAAQS

- New federal standards approach background pollution concentrations
- Technology does not exist to get all the emission reductions needed
- Meeting the standards require ban on fossil fuel combustion or emissions (**MAY NOT BE ENOUGH**)
- Meeting the standards require transformative changes
  - Cost prohibitive?
  - Require more time than allowed under the Clean Air Act
- Need to modernize antiquated federal Clean Air Act
- New NAAQS will impact most of the nation



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# Clean Air Act Needs Modernization

- Last amendments in 1990
- Well-intentioned provisions leading to unintended consequences
- Transition between standards is chaotic
  - Clean Air Act requires 5 year update
  - New standards are set regardless of progress towards meeting existing standards
  - District has 6 active SIPs (1 for a revoked standard)
  - Developing 4 new plans in the next two years



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# Clean Air Act Needs Modernization

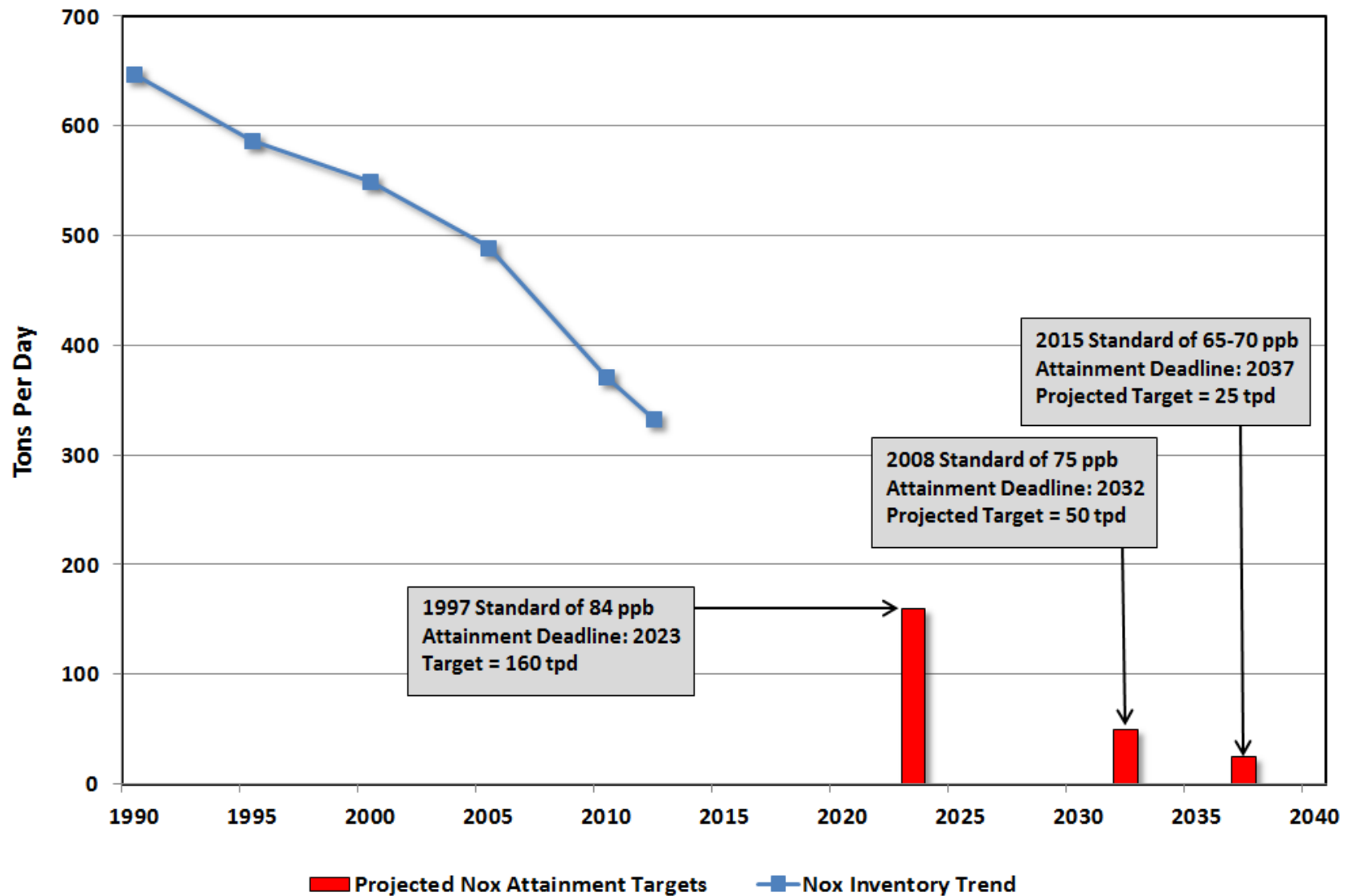
- Formula-based deadlines are unrealistic as new standards approach background concentrations
  - Technological achievability and economic feasibility must guide establishment of mandated deadlines and milestones
- Absent Congressional guidance, courts/EPA impose impossible mandates
  - Requirements to Offset Growth in VMT requires taking 5.1 million vehicles off the road in San Joaquin Valley (only 2.6 million in the Valley)



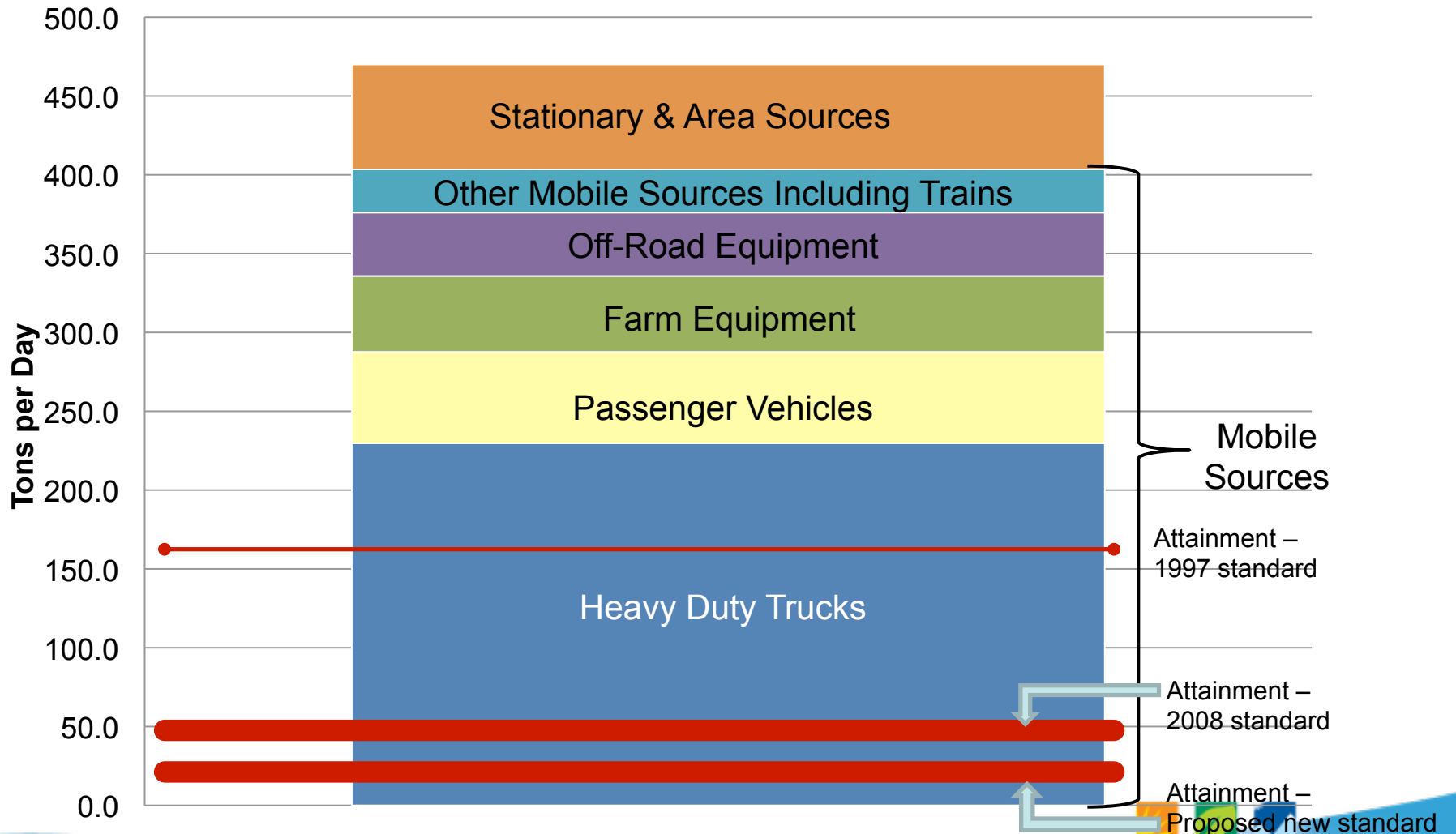
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## San Joaquin Valley Annual Average NOx Emissions Inventory and Targets for Attainment of 8-hour Ozone Standards

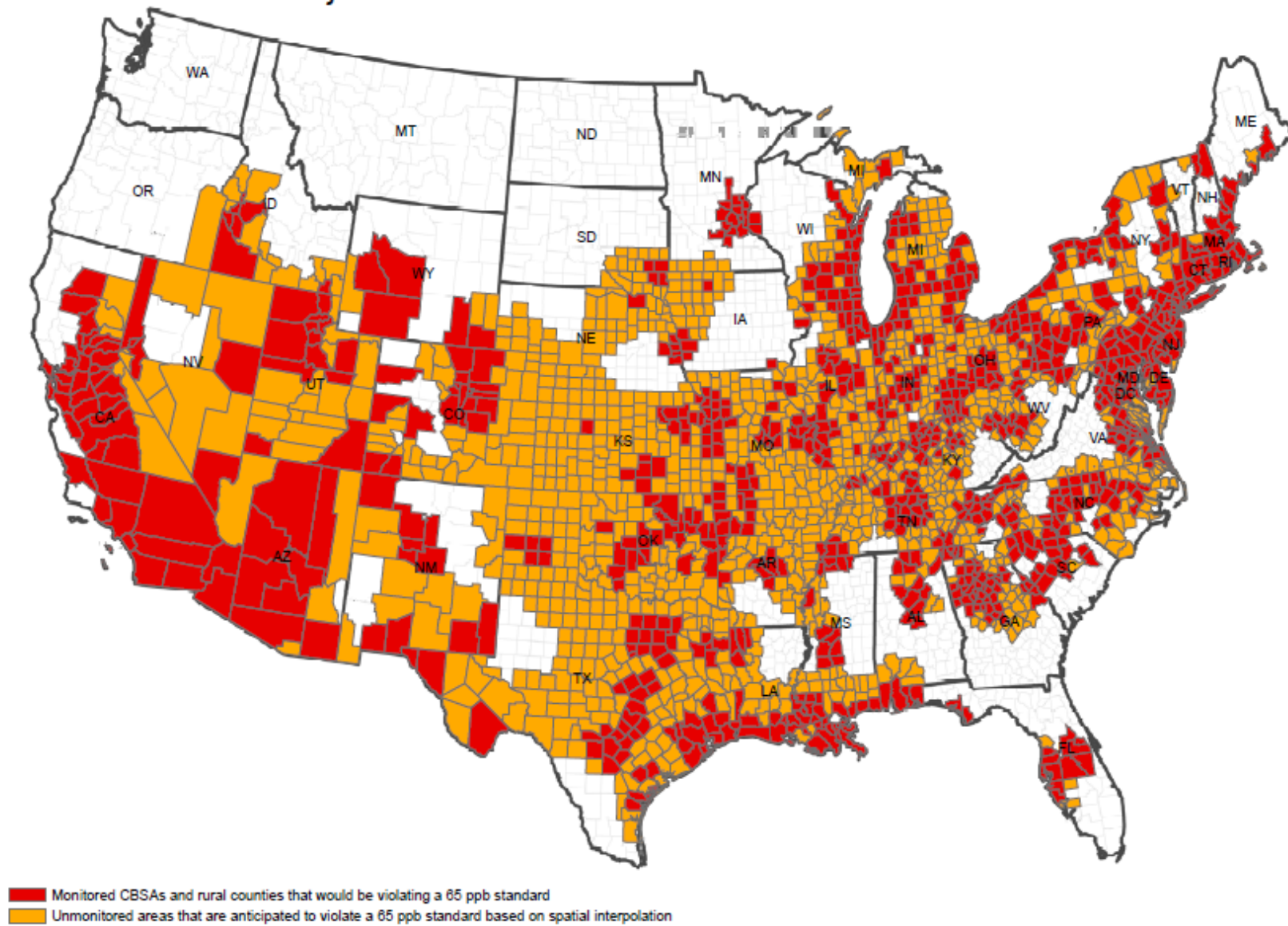


# Meeting New Federal Ozone Standards San Joaquin Valley





## Projected 8-Hour Ozone Nonattainment Areas



Based on a 3-year period, 2011-2013.

Source: URS, July 7, 2014