

'Dual path' will get Valley to clean air faster

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By Peter E. Weber

On April 30, the regional air board approved a "dual path" to clean up the Valley's air, which means setting 2024 as the official, legally mandated cleanup deadline, but simultaneously working to speed up attainment to 2019, perhaps sooner. In a May 2 editorial, The Bee questioned why the "dual path" couldn't be folded into one legally binding path.

"If you have trouble following that pea," The Bee said, "you're not alone." Fair point. It's a difficult pea to follow. Let me try to explain.

As chair of the Air Quality Work Group of the California Partnership for the San Joaquin Valley, I've spent the last 18 months deeply immersed in the intricacies of the Federal Clean Air Act. The act requires all air basins with non-attainment designations to submit attainment plans based on EPA-approved forecasting models. Emission reductions must be quantifiable, enforceable, surplus, permanent and based on current technology. If financial incentives are used to get the reductions, money must be in the bank.

In 2004, 15 California air basins were assigned classifications by the EPA for the new eight-hour ozone standard and asked to deliver attainment plans by June 15, 2007. Areas unable to comply with the designated attainment date have the option to request extensions. As it turns out, most areas in California were underclassified. Eleven of the 15 air basins are requesting extensions.

The Valley received a "serious" classification with a 2013 attainment date, a significant underclassification given the fact that the Valley's geography and climate makes ours the most challenging air basin in the country. To achieve attainment, we need to reduce our nitrogen oxide emissions from 624 tons to 160 tons, a 75% reduction, and we have to do so under the rigorous EPA criteria described above.

We can request an extension to "severe" with an attainment date of 2019 or 2021. If it is impossible for us to demonstrate attainment by then, we are allowed to address the shortfall with "future technologies," but only if we request an "extreme" classification with a 2024 deadline. That's the situation in which we find ourselves.

Still come up short

Exhaustive analysis shows that using every practicable measure acceptable to EPA, we are 100 tons per day short of attainment by 2021. The district's plan will cost more than \$20 billion and it will get us most of the reductions we need, but we simply do not have the technology today to completely close the gap.

"Come on," you say, "if we can get a man to the moon in 10 years" Fair enough, but remember that EPA places significant constraints on the emission reductions we can claim and insists that the plan must be based on current technology. That's what takes us to a formal, legally approvable path with an "extreme" designation and a 2024 deadline.

But we need not reconcile ourselves to attainment on that date. Indeed, we must commit ourselves to accelerating attainment by doing some things "on the side," as The Bee put it in its editorial. That's where the dual path comes in.

Let me illustrate. Mobile sources account for 80% of the Valley's NOx. Technology is making great strides in cleaning diesel-engine emissions, but the problem is the legacy fleet of vehicles. The average life of a truck in the U.S. is 23 years. As a Valley resident, you've almost certainly seen tractors that are more than 40 years old.

We can accelerate turnover of that mobile fleet through incentive mechanisms. Indeed, the Air District has proposed programs that would reduce the 100 tons per day emissions shortfall by 40 tons, enabling

1.1 million more people to breathe clean air by 2020, but the cost is about \$3 billion. We're working to get that funding, but until we have it secured, we can't count it in the official plan.

Another example is short sea shipping, which could potentially enable us to move thousands of trucks off Highway 99 and Interstate 5 by taking much of the pass-through cargo and moving it by sea. A study of this option is under way. We can make a significant dent in the remaining 60 tons per day gap if we explore this option, find it feasible and build the system. But we cannot today count those potential emission reductions in our official plan.

There are many other examples of things that we can do "on the side." The bottom line is that we are confident we can reach attainment long before 2024. We just can't make that claim in the official plan submitted to EPA.

Peter E. Weber is the chairman of the Air Quality Work Group of the California Partnership for the San Joaquin Valley.