

Appendix H

Summary of Significant Comments and Responses

2015 Plan for the 1997 PM_{2.5} Standard
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**SUMMARY OF SIGNIFICANT COMMENTS
MARCH 17, 2015 PROPOSED 2015 PLAN FOR THE 1997 PM2.5
STANDARD**

EPA REGION IX COMMENTS:

No comments were received from EPA.

ARB COMMENTS:

No comments were received from ARB.

PUBLIC COMMENTS:

No comments were received from the public.

SUMMARY OF SIGNIFICANT COMMENTS

MARCH 4, 2015 DRAFT 2015 PLAN FOR THE 1997 PM_{2.5} STANDARD

EPA REGION IX COMMENTS:

No comments were received from EPA.

ARB COMMENTS:

No comments were received from ARB.

PUBLIC COMMENTS:

Comments were received from the following:

Agricultural Producers and Processors (APP)¹
Central California Environmental Justice Network (CCEJN)
Central Valley Air Quality Coalition (CVAQ)
City of Fresno Planning (COF)
Dairy Cares (DC)²
Medical Advocates for Healthy Air (MAHA)
Sandra Brock (Brock)
Southern California Gas Company (SCGC)

- 1. COMMENT:** Will GAMAQI be updated to reflect the change in the definition of a major source for PM_{2.5} from 100 tons per year (tpy) to 70 tpy for NSR level? (COF)

RESPONSE: The GAMAQI does not refer to any major source definition or thresholds for NSR. Therefore, revisions to the GAMAQI are not necessary.

¹ Agricultural Producers and Processors: Comments were submitted on behalf of the following agricultural agencies, representing agricultural producers and processors throughout the Valley: African American Farmers of California, California Blueberry Association, California Citrus Mutual, California Cotton Ginners Association, California Cotton Growers Association, California Farm Bureau Federation, California Fresh Fruit Association, Corcoran Irrigation District, Fresno County Farm Bureau, Kings County Farm Bureau, Kern County Farm Bureau, Milk Producers Council, National Hmong American Farmers, Nisei Farmers League, Stanislaus County Farm Bureau, Tulare County Farm Bureau, Tulare Lake Basin Water Storage District, Tulare Lake Drainage District, Tulare Lake Resource Conservation District, Western Agricultural Processors Association, Western Growers Association, Delta Lands Reclamation District No. 770, El Rico Reclamation District No. 1618, Homeland Reclamation District No. 780, North Central Reclamation District No. 2071, South Central Reclamation District 2125, Tulare Lake Reclamation District 749, Peoples Ditch Company, Last Chance Water Ditch Company, Tulare Lake Canal Company, Southeast Water Company

² Dairy Cares is a coalition of dairy and milk producer and processor organizations and cooperatives including: Western United Dairymen, California Dairy Campaign, Milk Producers Council, California Farm Bureau Federation, California Cattlemen's Association, California Dairies, Inc., Dairy Farmers of America-Western Area Council, Hilmar Cheese Company, and Land O'Lakes, Inc.

2. **COMMENT:** The District should consider offering incentives to lead agencies to implement subdivision ordinances that prohibit wood burning of any type and that prohibit the creation of more dirt roads. (Brock)

RESPONSE: The incentive programs operated by the District are typically created under specific guidelines to ensure the emissions reductions achieved by these programs are cost-effective, enforceable, and quantifiable. Incentives for implementing ordinances to prohibit wood burning or dirt roads would be difficult to quantify and may not be cost-effective. Additionally, the District already regulates the installation of wood burning fireplaces and wood burning heaters through density requirements in Rule 4901, and implements wood burning curtailments during poor air quality episodes through the Check Before You Burn program. Similarly, District Rule 8061 already limits fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

3. **COMMENT:** The claim that the Valley is NO_x-limited is insufficiently supported. The District should revise *the 2015 PM_{2.5} Plan* to include ammonia controls because ammonia is a major precursor for PM_{2.5}. (CVAQ, MAHA)

RESPONSE: The plan control strategy achieves the emissions necessary to bring the Valley into attainment, primarily through PM_{2.5} and NO_x emissions reductions. Most areas of the Valley will reach attainment well before 2020. The District's incentive programs, public outreach, and other innovative strategies will help expedite air quality improvements as this plan is implemented. Although the plan shows expeditious attainment and includes a comprehensive control strategy for direct PM_{2.5} emissions and significant PM_{2.5} precursors, the District and ARB explored the effectiveness of ammonia reductions in reducing PM_{2.5} concentrations.

The review of extensive science on this subject and previous modeling conducted conclude that reducing ammonia emissions is orders of magnitude less effective in reducing PM_{2.5} concentrations than reducing directly emitted PM_{2.5} or NO_x emissions. There is a relative abundance of ammonia compared to nitric acid, and the amount of nitric acid drives the ultimate formation of ammonium nitrate. Because of this regional surplus in ammonia, even substantial ammonia emissions reductions yield a relatively small reduction in nitrate. Reductions in nitrate concentrations of 30% to 50% were realized through a 50% reduction in NO_x. Modeling a 50% reduction in ammonia, while unrealistic and not technologically achievable, would only realize less than 5% reductions in nitrate concentrations.

Despite the fact that ammonia is an insignificant PM_{2.5} precursor in the Valley, the District evaluated current ammonia controls in Appendix C (BACM and MSM for Stationary and Area Sources) of this plan. The analyses show that the Valley's ammonia emissions have been significantly reduced through stringent District regulations and current regulations implement BACM and MSM

in the Valley. The District has already reduced ammonia emissions from CAFs, the largest source of ammonia emissions under its jurisdiction, by over 100 tons per day through adoption of Rule 4570 (Confined Animal Facilities), the most stringent rule of its kind in the nation. The District did not find any additional feasible measures that could significantly reduce ammonia emissions.

4. **COMMENT:** Why has the District not achieved the same NO_x reductions for this plan from stationary sources as ARB has achieved from mobile sources? (CCEJN)

RESPONSE: The District has implemented a comprehensive regulatory control strategy for over twenty years. Since 1992, the District has adopted over 600 rules and amendments to implement this aggressive control strategy. Many current rules are fourth or fifth generation, meaning that they have been revised and emission limits have been lowered, as new emission control technology has become available and cost-effective. As a result of these extensive efforts and significant investments from Valley businesses, the emissions in the Valley from stationary sources have been reduced by 80% or more.

ARB and EPA have regulatory authority over mobile sources of emissions in the Valley. As demonstrated in Figures 2-4 and 2-5 (see Chapter 2) the majority of the remaining emissions in the Valley are generated by mobile sources. In part due to the success of prohibitory rule efforts implemented by the District on stationary and area sources; in fact, mobile sources are now responsible for 85% of NO_x emissions in the Valley (see Appendix B).

5. **COMMENT:** Explain the difference between Best Available Control Measures (BACM) and Lowest Achievable Emissions Rate (LAER), and whether it is possible to implement LAER instead of BACM. (CCEJN)

RESPONSE: EPA defines BACM as the maximum degree of emissions reductions achievable from a source or source category, which is determined on a case-by-case basis considering energy, economic, and environmental impacts. LAER, on the other hand, is the most stringent emissions control that is technologically feasible and does not take into consideration any economic impacts or rather the cost effectiveness of a potential control measure.

Within Appendix C of this plan, the District has examined every source category in the Valley for any potential opportunities for additional emissions reductions, which included reviewing LAER levels of control. However, since EPA's definitions for BACM and Most Stringent Measures (MSM) state that air districts should account for the economic feasibility of all potential BACM or MSM, the District evaluated the cost effectiveness (in dollars per year, per ton of emissions reduced per year) of all technologically feasible control measures to determine if

there were additional measures not already implemented in the District that qualify as BACM and/or MSM.

Aside from this planning process, the District also evaluates LAER through the new source review (NSR) process, per District Rule 2201 (New and Modified Stationary Source Review Rule). Anytime there is a new or modified stationary source of air pollution, the respective source is required to implement Best Available Control Technology (BACT) levels of control for their new or modified equipment. To determine what qualifies as BACT, the District examines all LAER controls and then evaluates the cost effectiveness of the potential measure to see if it qualifies as BACT for that particular source.

Given the high cost effectiveness of BACT/BACM controls, most air districts only enforce such stringent and costly requirements on new sources. However, due to the District's unique air quality challenges, the District has enforced BACT/BACM levels of emissions controls on numerous retrofitted sources for years through these stringent permitting provisions and multi-generational rules.

6. **COMMENT:** Provide more detail on the composition of ammonium, sodium, nitrate, etc., specifically for confined animal facilities (CAFs). Also, there are incentives for agricultural equipment, but when are agricultural equipment rules coming? (CVAQ)

RESPONSE: Information on the general composition of PM_{2.5} in the San Joaquin Valley can be found in Chapter 3 of the *2015 Plan for the 1997 PM_{2.5} Standard*. Figure 3-2 (page 3-12) of the plan shows the average annual compositions of PM_{2.5} in Fresno and Bakersfield. Recently, research has been undertaken to better characterize PM emissions from CAFs. The research available has indicated that the majority of directly emitted PM from CAFs is larger than PM_{2.5}. In addition, most of directly emitted PM from CAFs is expected to occur in the dry summer months, rather than the winter months when the San Joaquin Valley has the highest concentrations of PM_{2.5}.

As discussed in the plan, ammonium nitrate and ammonium sulfate are not directly emitted, but rather are formed through secondary atmospheric reactions between precursors. As discussed in Chapter 2, Section 2.6 of the plan, because the formation of secondary ammonia particulate is limited by other precursors, ammonia is not a significant precursor to PM_{2.5} values in the San Joaquin Valley. Although ammonia is not a significant precursor to PM_{2.5} values in the Valley, the District has adopted stringent regulations that have reduced ammonia emissions (e.g. Rule 4565 - Biosolids, Animal Manure, and Poultry Litter Operations, Rule 4566 - Organic Material Composting, and Rule 4570 - and Confined Animal Facilities - Rule 4570). The District has already reduced ammonia emissions from CAFs, the largest source of ammonia emissions under its jurisdiction, by over 100 tons per day through adoption of Rule 4570 (Confined Animal Facilities), the most stringent rule of its kind in the nation. Please

reference Section C.41 (Ammonia Controls) in Appendix C of this plan for additional information.

Lastly, ARB is currently undertaking a rule making process to regulate agricultural equipment, and the District is supportive of that effort.

7. **COMMENT:** CNG engines are available that achieve greater emission reductions than the 2010 truck standards. The District should consider requiring greater reductions than those required in the 2010 truck standards by requiring or incentivizing the use of natural gas trucks. (SCG)

RESPONSE: The District is actively encouraging the continued development and certification of cleaner natural gas engines. Through the Technology Advancement Program, the District is partnering with an engine manufacturer for demonstration and durability testing of an advanced natural gas engine to be certified to an optional NOx standard which is 90% cleaner than the current engine standard. Additionally, the program is demonstrating natural gas/electric hybrid projects in both class 4 and class 7 trucks, highlighting the benefit of natural gas in those categories. The District is also considering additional methods to incentivize and encourage natural gas vehicles in the Valley.

8. **COMMENT:** How do wildfires and controlled burns affect PM2.5 levels and attainment of the federal standards? Also, what is the District's involvement with agencies such as Bureaus of Land Management for large controlled burning? The District should do more outreach to rural areas for controlled burns. (COF)

RESPONSE: With the Valley being surrounded by mountain ranges, wildfires have the potential to have a significant impact on PM2.5 levels and subsequently affect the region's ability to reach attainment of the federal PM2.5 standards. However, wildfires are considered "Exceptional Events" by EPA and outside of the control of the District. The recorded PM2.5 levels affected by these emissions can be removed from the regulatory data set used to determine compliance with the PM2.5 standards. This exceptional event process requires that extensive documentation be provided to EPA to support the event's impact on the recorded values, showing that the high values would not have occurred "but for" the added emissions from the wildfire event.

The emissions from controlled burns constitute a significantly smaller PM2.5 fraction compared to wildfires, and usually have minimal and temporary impact on any nearby air quality monitors, if any. Controlled burns also play a critical role in reducing the fuel loading within these mountain ranges and help prevent catastrophic wildfires from potentially occurring. Controlled burning activities are regulated by the District under Rule 4106 (Prescribed Burning and Hazard Reduction Burning).

The District works in close coordination with the National Forest Service, the National Park Service, and other Land Management Agencies (LMAs) to strategically approve controlled burns only on days when air quality and atmospheric dispersion conditions are favorable. The District and LMAs also work together to minimize the potential smoke impacts to nearby communities from these burning activities. Through partnership with the District, the LMAs ensure that nearby communities are aware when a controlled burn is being planned for the area through the posting of information in public spaces, local publications, town hall meetings, electronic media, etc. The information shared assists the residents to plan appropriately while considering the potential temporary air quality impacts in the area. The District will continue to work closely with the LMAs in making sure that the public is made aware of future controlled burn projects in advance of their planned ignition.

9. **COMMENT:** We support the District's prioritization of control strategies that will result in the greatest human health benefits. We appreciate the District's willingness to consider incentives for conservation tillage. We also support more natural gas trucks, especially if running on renewable natural gas such as can be generated with dairy manure. (DC)

RESPONSE: The District appreciates the comments above and will continue to evaluate potential control strategies under the District's Health Risk Reduction Strategy.

The District also supports efforts to reduce emissions through innovative approaches through its technology advancement program and through on-going research efforts.

10. **COMMENT:** Rule 9510 (Indirect Source Review) was last updated in 2005; additional emissions could be reduced by expanding the rule's applicability. The District should also eliminate the option for businesses to pay fees in lieu of mitigation measures and should require them to meet a minimum emissions level before paying fees. In addition, the District should increase the emissions reductions required for projects and add PM2.5 emissions limits. (CVAQ)

RESPONSE: Rule 9510 does not allow all project proponents to pay fees in lieu of mitigation requirements. The rule recognizes that while project design and CEQA mitigation requirements are land-use decisions that are outside the scope of the District's direct regulatory authority, it is possible through the use of increased fees to encourage better project design, leading to lower emissions.

In regards to the emissions reductions required for projects, Rule 9510 currently requires that all emissions above certain thresholds be mitigated through the District's emission reduction incentive grant programs via the payment of fees to the District. Those fees are established at levels that the District demonstrates,

on an annual basis, to be sufficient to mitigate the full targeted emissions for projects subject to the rule.

Lastly, adding a specific PM_{2.5} component to the rule would not result in reduced PM_{2.5} emissions because the rule already targets PM₁₀ emissions. PM_{2.5} is a subset of PM₁₀, and for combustion sources, PM₁₀ is nearly 100% PM_{2.5}. In fact, the sources of emissions reductions obtained through the District's incentive programs are nearly 100% combustion sources, including both mobile and stationary sources. Therefore, by targeting PM₁₀ sources, Rule 9510 also effectively addresses PM_{2.5} emissions.

11. **COMMENT:** The District should revise Rule 4901 (Wood Burning Fireplaces and Wood Burning Heaters) to eliminate wood burning when the Valley is expected to exceed the 2006 PM_{2.5} NAAQS of 35 µg/m³. (CVAQ)

RESPONSE: Based on the latest amendments (September 2014), Rule 4901 is the most stringent wood burning curtailment rule in the nation. Residential wood-burning with unregistered devices are no longer allowed when an area's forecasted PM_{2.5} concentration is expected to be greater than or equal to 20 µg/m³ which comprise over 95% of wood burning emissions. This threshold is lower compared to past years when it was set at 30 µg/m³. As such, this threshold is much lower than the 2006 and 2012 federal 24-hour average PM_{2.5} standard of 35 µg/m³. Allowing the cleanest wood burning heaters to be used between 20 and 65 µg/m³ provides significant motivation to Valley residents for transitioning away from older higher polluting devices to the cleanest wood burning heaters. A registered wood burning heater pollutes at least twenty times less than a wood burning fireplace; therefore, encouraging this transition reduces emissions beyond those that could be accomplished by only reducing the curtailment threshold to 20 µg/m³. The latest amendments to Rule 4901 will achieve an estimated reduction of 5.1 tons per day of PM_{2.5} emissions.

12. **COMMENT:** The District should implement fleet rules for publicly-owned vehicles in the Valley. The District's current fleet rule applies to school buses, but the SCAQMD fleet rules apply to buses, light-, medium-, and heavy-duty public fleet vehicles, airport ground transportation such as taxis and shuttles, and street sweepers. (CVAQ)

RESPONSE: Advancing the turnover of fleets is a critical component of reducing emissions. ARB has adopted fleet rules that have greatly reduced emissions from public fleet vehicles, and have superseded efforts at local levels to reduce emissions from those same fleets. The District also operates some of the most effective and robust vehicle grant programs in the nation, including a first of its kind rule to quantify emissions reductions from incentive programs for SIP creditability. The District will continue to look into opportunities for new fleet

rules, but at this time the District advances the turnover of fleets through the use of incentive funds.

13. **COMMENT:** ARB should develop enforceable agricultural equipment regulations as soon as possible to accelerate attainment of the 1997 PM2.5 NAAQS in the Valley. (CVAQ)

RESPONSE: The District recognizes the need for additional emissions reductions from mobile agricultural equipment to address not only the 1997 PM2.5 NAAQS, but the newer, more stringent federal 2006 PM2.5 NAAQS and 2012 PM2.5 NAAQS. As such, the District will continue to work with ARB and the agricultural industry to develop regulations for mobile agricultural equipment (under ARB's regulatory authority) to increase the use of the cleanest technologies as they become available in the San Joaquin Valley.

14. **COMMENT:** The District Conservation Management Practices rule (Rule 4550) should be updated to reflect current practices, practices that overlap with other agency regulations should not be elective or be used to evidence rule compliance. Menu items regarding surface control in all agricultural operations should be uniform and consolidated into a single section applicable to all operations regardless of category (crops, cows, and poultry). The number of options a regulated entity can choose to show compliance must be increased significantly. Many of these practices are BACM and should no longer be available as options. (CVAQ)

RESPONSE: The District evaluates the effectiveness of Control Management Practices (CMPs) on a regular basis, as illustrated on the District's web page under Requirements for Agricultural Operations. While Rule 4550 has been successful in reducing both PM10 and PM2.5 emissions, recent studies have indicated that the PM2.5 fraction of emissions makes up a small portion of the total particulate emissions from agricultural operations. Additionally, particulate emissions from agricultural operations are geologic in nature. These geologic particulate emissions make up a relatively small portion of the overall PM2.5 concentrations during the winter season and have relatively low toxicity when compared to the organic carbon fraction of PM2.5 and to re-suspended road dust. Given the relatively low contribution that emissions from this category make to the Valley's PM2.5 concentrations and current stringent requirements under Rule 4550, the District has not identified any additional rule amendment opportunities for further emission reductions from source categories subject to CMP requirements to include in this plan. As demonstrated above, Rule 4550 currently has in place the most stringent measures feasible to implement in the Valley and therefore meets or exceeds both BACM and MSM requirements for this source category.

However, the District is leaving no stone unturned and is committing to reevaluate Rule 4550 for all feasible opportunities for additional emissions reductions, if any, in the context of the upcoming PM2.5 plans in 2016/2017.

15. **COMMENT:** Emission reductions that the District intends to use from incentive programs under Rule 9610 are not SIP-creditable. (CVAQ)

RESPONSE: Incentive programs are an integral part of the emission reduction efforts of the District. These programs have invested over \$1 billion in public/private funding towards incentive-based emission reduction projects that have reduced over 100,000 tons of NOx, VOC, and PM2.5 emissions since 1992. District incentive programs have been modeled on effective state incentive programs like the Carl Moyer Program. Enforceability has already been built into the District incentive programs through requirements that include pre and post project equipment inspections, monitoring, and reporting. Rule 9610 provides the mechanism for the District to take credit for these surplus, quantifiable, and enforceable emissions reductions. EPA approved Rule 9610 on February 26, 2015, finding that incentive-based emissions reductions are fully SIP-creditable.

16. **COMMENT:** The District should improve its public outreach process. (CVAQ)

RESPONSE: The District appreciates the recommendations for further outreach opportunities. The *2015 PM2.5 Plan* was prepared through an involved public process that provided multiple opportunities for the general public and interested stakeholders to offer suggestions and comments for improving and strengthening the plan. The District has worked closely with these various stakeholders, including its partner agencies ARB and EPA, environmental and community advocacy groups, and business representatives to share information regarding the plan, and to receive comments and suggestions.

Numerous opportunities were provided for public input during District Governing Board public hearings, Citizen's Advisory Committee public meetings and Environmental Justice Advisory Group public meetings. The District also met with interested advocacy and industry representatives throughout the plan development process to address specific questions and comments, and solicit further suggestions for control strategies. The District held a public workshop for this plan on March 4, 2015 at the District's offices in Modesto, Fresno, and Bakersfield and by webcast, with many participants attending and providing feedback. The District also posted the *Proposed 2015 PM2.5 Plan* on the District's webpage on March 17, 2015 for a 30-day public noticing period.

17. **COMMENT:** PM2.5 geologic emissions from agricultural operations are insignificant and attempts to control these emissions are unwarranted. There continues to be artificially high emissions of PM2.5 attributed to "farming

operations”. There has been significant research on PM_{2.5} emissions from agricultural sources, including studies conducted in the Valley, which should be incorporated wherever and whenever possible. Results of the multi-year study of cotton gin emissions under the USDA indicate only 2.4% of total suspended particulate are PM_{2.5}. Emissions from almond harvesting operations report PM_{2.5} emissions to be in a range of 1.1% to 1.6%. Additionally, ARB determined in 1995 that “geological material” made up less than 1% of the total source contributions. (APP, DC)

RESPONSE: As described further in Appendix C of this plan, under Rule 4550 (Conservation Management Practices), the PM_{2.5} fraction of emissions makes up a small portion of the total particulate emissions from agricultural operations. Additionally, particulate emissions from agricultural operations are geologic in nature, make up a relatively small portion of the overall PM_{2.5} concentrations during the winter season, and have relatively low toxicity relative to the organic carbon fraction of PM_{2.5} and to re-suspended road dust.³ Accordingly, particulate emissions from agricultural sources do not play a significant role with regard to attainment of the PM_{2.5} standards addressed by this plan, and Rule 4550 is primarily a PM₁₀ reduction strategy.

Given the relatively low contribution that emissions from this category make to the Valley’s PM_{2.5} concentrations and current stringent requirements under Rule 4550, the District has not identified any additional rule amendment opportunities for further emission reductions from source categories subject to CMP requirements to include in this plan. It is also questionable that further opportunities for reducing PM_{2.5} emissions exist.

However, in developing plans for the new and existing National Ambient Air Quality Standards, the District will leave no stone unturned to evaluate and identify further opportunities to advance attainment of the ever-tightening National Ambient Air Quality Standards. Any opportunities identified to reduce emissions towards meeting these tougher standards may also help expedite attainment with the 1997 PM_{2.5} standard addressed by this plan. In developing these plans, the District will reevaluate all of its existing regulations and will explore all potential measures for all source categories. As such, the District commits to evaluate all feasible opportunities for additional emissions reductions from Rule 4550, if any.

- 18. COMMENT:** Windblown dust is not an issue for the Valley, especially for PM_{2.5}. According to USDA documents, wind erosion occurs when wind speed reaches 13 mph, which rarely occurs in the Valley and when it does occur, it does not lead to exceedances of the federal standard. It has been found that only a fraction of suspendable particles are transportable particles and in the absence

³ Rogge, W. F., Hildemann, L. M., Mazurek, M. A., Cass, G. R. and Simoneit, B. R. T. *Sources of Fine Organic Aerosol—3. Road Dust, Tire Debris, and Organometallic Brake Lining Dust—Roads as Sources and Sinks.* *Environmental Science & Technology* 27(9), 1892-1904. 1993.

of violent winds there is little, if any, residual or continuing source of energy to sustain vertical motion and transport of these emissions. The District must not require additional control measures of agricultural sources located in rural areas. (APP)

RESPONSE: The Valley experiences wind-blown dust events from time to time typically during the spring and fall seasons when weather disturbances are most common. These events are less likely to occur during the long stagnation periods of the summer and winter. When soil conditions are dry, strong wind events often entrain coarse particulate matter into the atmosphere, carrying the pollution long distances across the Valley. This phenomenon has the potential to create higher concentrations of PM10 in its path of impact.

Although these events primarily cause higher PM10 concentrations, there are rare instances where PM2.5 concentrations become elevated. In addition to the rarity of elevated PM2.5 concentrations, the PM2.5 values recorded during the strong stagnation periods of the winter season are usually much higher than those recorded during wind events. Because of this, the Valley's PM2.5 design values are driven primarily by high winter-time concentrations, mostly due to organic carbon and the secondary formation of ammonium nitrate. Comparatively, the geologic component of the Valley's peak PM2.5 concentrations is only a fraction of the mass formed through secondary processes and other sources. As a result, the wind events experienced in the Valley are not a significant contributor to the PM2.5 attainment challenges for the region, and placing further controls on this source would not make a substantial difference in the District's PM2.5 design values.

19. **COMMENT:** We appreciate the District's inclusion of incentive programs as a viable emissions reduction strategy for NOx and PM2.5. We ask the District to include specific references to the USDA-NRCS and their California Air Quality EQIP Fund Pool for Particulate Matter Reduction for their incentives to reduce PM emissions. We support additional funding for agricultural trucks for early adoption and we commit to working with the District to seek out additional funds and help promote an incentive based program for agricultural trucks. (APP)

RESPONSE: The District appreciates the vast economic resources dedicated from USDA-NRCS and EQIP to incentivize zero and near-zero emitting technologies in the Valley. Chapter 7 (Attainment Strategy) includes a discussion of the collaboration between EPA, ARB, USDA-NRCS, and the District to adopt Rule 9610 (State Implementation Credit for Emission Reductions Generated Through Incentive Programs) on June 20, 2013 and effectively establish the administrative mechanism through which the District and ARB can take SIP credit for emissions reduced through these types of incentives previously provided by USDA-NRCS.

In addition, the District supports additional funding to help incentivize the replacement of agricultural trucks in the Valley. The District has included a commitment to fund \$10 million dollars for the replacement of heavy duty trucks in the Valley between 2016 and 2020, and ARB has also committed to do their part by committing to provide additional reductions in emissions for sources under their control. ARB staff will propose a commitment on actions for key truck sectors in the Valley to better ensure benefits from the Truck and Bus regulation and pursue opportunities for the replacement of trucks certified to the State's optional low-NOx standard. The District will continue to work closely with ARB on this issue.

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