

APPENDIX B

COMMENTS RECEIVED ON NOTICE OF PREPARATION/INITIAL STUDY

**KERN COUNTY AIR POLLUTION CONTROL DISTRICT
THOMAS PAXSON, P.E., APCO**



ENVIRONMENTAL AUDIT, INC

JUL 14 2004

RECEIVED

July 7, 2004

Ms. Debbie Bright Stevens
Environmental Audit, Inc.
1000 Ortega Way Suite A
Placentia CA 92870

Subject: Comments on NOP for SJVUAPCD Ozone Attainment Demonstration

Dear Ms. Stevens:

KCAPCD would like to take this opportunity to comment on the "Initial Study / Notice of Preparation" for the San Joaquin Valley Unified APCD Extreme Ozone Attainment Demonstration Plan. Our comments are as follows:

1. On page 17 under Subsection III. a), this "project" should be identified as having potential to significantly impact Kern County APCD's ozone attainment plan. This is because implementation could result in increased downwind ozone concentrations. CARB has identified KCAPCD as being "overwhelmingly" impacted by transport of ozone from the San Joaquin Valley air basin. There has been at least one case (South Coast air basin) in which upwind NO_x reductions (in Los Angeles) resulted in downwind (Riverside) ozone increases (decreased ozone scavenging). On pages 9, 10 and 11, several SJVUAPCD NO_x control measures are described which could potentially interfere with KCAPCD's ability to attain ozone standards.

1-1

2. In Section III. on page 27, it is stated implementation of contemplated control measures could have an adverse air quality impact if implementation resulted in the emission of new criteria or toxic pollutants. This section should also discuss the potential of NO_x reductions impacting downwind ozone concentrations.

1-2

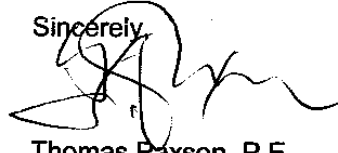
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3. We agree with the conclusion in Section XVII. on page 47 that preparation of an EIR is appropriate for this project. The EIR should include a quantitative analysis of the downwind impact on ozone of emission control measures described in the attainment plan.

1-3

Thank you for the opportunity to provide these comments. Please let me know if you have any questions.

Sincerely,



Thomas Paxson, P.E.
Air Pollution Control Officer

TP

RESPONSE TO COMMENT LETTER NUMBER 1

KERN COUNTY AIR POLLUTION CONTROL DISTRICT

JULY 7, 2004

Response 1-1

The comment is noted and the impact of the NOx reductions upwind is discussed in Section 3.2.2.4.2 of the draft EIR.

Response 1-2

The strategy of both NOx and VOC reductions in the Valley in the 1994 OADP has allowed the Kern District to go from nonattainment to attainment of the federal one-hour ozone standard. The Extreme OADP continues this approach of pursuing both VOC and NOx emission reductions. In fact, the new District emission reductions in the Extreme OADP are mostly from new VOC measures. Most of the NOx reductions are from measures already committed to in the District's 2003 PM10 Plan.

Typically NOx is a benefit to the area near where it was emitted (NOx scavenging). The District's analysis of NOx reductions in the Bay Area has shown it to be more beneficial to reduction of ozone at SJVAB sites than at Bay Area sites. Looking at the difference plots for the episode used in the Extreme OADP, ozone decreased in all areas of the domain except for the area immediately surrounding the San Francisco Bay. In this episode modeled for the Extreme OADP, the emission reductions in the plan do reduce ozone in the Mojave Desert portions of Kern County Air Pollution Control District.

The District thanks Mr. Paxton for his comment and offers to meet and discuss these control strategies issues in more detail at his convenience. See also Response 1-1.

Response 1-3

The concurrence on the preparation of an EIR is noted. Where sufficient data are available to perform quantitative analyses, quantitative analysis has been included in the draft EIR.