

**SUMMARY OF COMMENTS AND RESPONSES
SUBMITTED DURING PUBLIC REVIEW OF THE
PROPOSED EXTREME OZONE ATTAINMENT DEMONSTRATION PLAN
FOR THE SAN JOAQUIN VALLEY AIR BASIN**

October 8, 2004

The San Joaquin Valley Unified Air Pollution Control District (District) released the Proposed *Extreme Ozone Attainment Demonstration Plan* (OADP) to the public on September 7, 2004, thirty days in advance of the District Governing Board hearing at which this plan will be considered for adoption. The District mailed notices for availability of the Proposed *Extreme OADP* to about 1200 entries on the *Extreme OADP* mailing list, and posted the notice of public hearing and availability of the Proposed *Extreme OADP* in the eight major Valley newspapers. On September 16, 2004, the District Governing Board received and filed the Proposed *Extreme OADP* for consideration at its next meeting, to be held October 8, 2004. At the September 16, 2004 meeting, District staff distributed an Errata sheet describing minor technical adjustments in the attainment demonstration calculations that were discovered as being necessary after the Proposed *Extreme OADP* was released for public review. The District Governing Board directed staff to incorporate these and related changes into the Proposed *Extreme OADP*, and to submit the Proposed *Extreme OADP* to the District Governing Board for consideration for adoption on October 8, 2004.

The public notice for the October 8, 2004 hearing and availability of the Proposed *Extreme OADP* established a cutoff date of September 24, 2004 for any additional public comments. One set of public comments was submitted via email by this deadline; a summary of the comments, and District responses, is given below.

WRITTEN COMMENTS

1. **Comment:** The terms of "ROG" and "VOC" should be defined.
Response: Chapter 9 in the *Extreme OADP* defines reactive organic gases (ROG) and volatile organic compounds (VOC). Both terms are used in the Proposed *Extreme OADP* and elsewhere because VOC is a federal term used in rules, regulations and guidance issued by the U.S. Environmental Protection Agency, whereas ROG is a California term used by the California Air Resources Board.

2. **Comment:** Are there estimates of the value of crops damaged by ozone air pollution?
Response: In October 1994, the California Air Resources Board released research results on the estimated costs of ozone air pollution to California agriculture. The analysis indicated that if ozone levels were reduced to an average of 0.04 ppm, the annual benefits to consumers would be \$275 million due to higher product availability and lower crop prices. Producers would be expected to benefit by \$215 million per year due to higher crop production volumes and lower unit costs of production. The total direct benefit (consumer plus producer) would be \$490 million per year; however, since at least one-third of the value of California crop production is exported, this value may overestimate the net benefits to the State estimates of crop damage from ozone in the San Joaquin Valley. See <http://www.arb.ca.gov/research/resnotes/notes/94-18.htm> for more details. Since no new major studies have updated these results, and since these results are reported in previous plans, the *Extreme OADP* did not repeat the results.
3. **Comment:** The District should investigate the role of anaerobic digestion in reducing VOC emissions.
Response: The District is evaluating anaerobic digestion in its rule development process for concentrated animal feeding operations.
4. **Comment:** Section 4.4.2 describes incentive programs for consumers to switch from gasoline powered lawn mowers to electric lawn mowers. Does the District have plans for an incentive program for other lawn equipment such as leaf blowers?
Response: The District's incentive program for electric lawn mowers was designed to offset the higher costs of electric vs. gasoline lawn mowers. This cost differential does not always exist for other types of lawn and garden equipment; for example, electric leaf blowers already cost less than gasoline-powered leaf blowers, so no economic incentive should be needed to encourage consumers to use the electric version of the equipment. Professional landscape services may have other reasons for using gasoline-powered equipment such as leaf blowers.

5. **Comment:** Purchasers of gasoline powered lawn and garden equipment, or people hiring professional lawn and garden services using such equipment, should be required to sign a form stating that the cumulative use of such equipment causes lung damage to Valley residents.
Response: Comment noted.
6. **Comment:** Emissions from consumer goods should be labeled, just as energy consumption is now labeled for appliances. For clothes dryers that burn natural gas, the advantages of passive solar drying should be on a label affixed to the appliance.
Response: Since ARB is involved with consumer products and labeling, this comment will be forwarded to them. A precedent for this concept already exists in the “star” labeling program for personal watercraft engines. A label of one star on an outboard motor indicates the highest emissions, whereas a label with four stars indicates the lowest emitting engine. See the ARB website at <http://www.arb.ca.gov/planning/sip/stfed03/stfed03.htm> for more information.