



San Joaquin Council of Governments

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## AIR QUALITY STANDARDS

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Since its adoption, the Clean Air Act has led to significant improvements in air quality and public health throughout our region. The Council of Governments supports the provisions in the Clean Air Act that call for routine review of the health based standards, clean air objectives that are technology forcing, and clean-air deadlines that ensure expeditious cleanup and timely action. However, there are a number of provisions in the Act that are leading to unintended consequences and misdirected resources.

The San Joaquin Valley must reduce its pollution levels by over 90 percent over the next two decades to meet the 2015 Ozone standard and are already in non-attainment for two other Ozone standards. The Valley also faces an EPA finding of failure to attain the 1997 PM2.5 standard, while also having to comply with other PM2.5 standards. Each of these standards requires a separate air quality plan which leads to multiple requirements and deadlines to include a labyrinth of air quality tests requiring massive coordination among numerous regional, state, and federal agencies. The County faces the potential for air quality conformity lockdown if harmonization of the above mentioned tests does not occur. Lockdown could lead to project delivery delays or the loss of millions of dollars for transportation projects in San Joaquin County and perhaps billions of dollars across the Valley.

Therefore, the Council of Governments supports the efforts of the San Joaquin Valley Air Pollution Control District to make changes to the Act that would harmonize the implementation process for various plans to meet standards under the act, to include items like stagnation of air masses and extreme drought as exceptional events, and to hold harmless (not invoke a financial penalty or rescind transportation funds) air districts or states that would be able to demonstrate attainment of air quality standards but for federal mobile sources that are beyond the control of that district or state.

The Council of Governments will work with the Valley Congressional Delegation (House and Senate), relevant Committees in Congress, and federal agencies to achieve cleaner air for the Valley while also ensuring that economic activity in the County continues.