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Subject: comment

Dr. Deborah Drechsler,

TRANSDEF is a Bay Area organization dedicated to improving the planning for air quality, transportation and land use. We are very pleased with the work of ARB and OEHHA in developing the new standard, and making the process so accessible through webcasting. It's rare these days to see government agencies making a good faith effort to be health protective. This is exemplary conduct that we appreciate.

We are especially appreciative that the design of the standard explicitly included a margin of safety, for the benefit of children and people with illnesses not yet studied. This is truly health protective. We appreciate the recommended third decimal place precision of the proposed standard. This recommendation resolves a contentious issue that has led to litigation over the federal standard. In sum, TRANSDEF strongly support the staff recommendation for state ozone standards.

We would like to see ARB further tighten the requirements on Districts to implement both standards. We have been consistently frustrated by the fuzziness and excessive discretion left to Districts by an "all feasible measures" directive. We consistently see Districts avoid regulatory efforts that are clearly feasible. This has led to extensive litigation in the Bay Area, for example. We would prefer, instead, to see a list of ARB-approved reasonably available measures. This would result in a simple evaluation of District compliance with the CCAA.

Along these lines, we can't let the opportunity go by without mentioning our organization's primary focus: the reduction in the growth of motor vehicle miles travelled, resulting in reduced air emissions and other environmental

impacts, as well as improvements in the quality of life of Californians. This is the province of transportation control measures, an arena in which ARB has been especially weak. TRANSDEF has come before the Board on several occasions, asking it to direct staff to develop a list of reasonably available transportation control measures. Because half the inventory of ozone precursors comes from motor vehicles, this step will be necessary if ARB is going to seriously strive for the attainment of both ozone standards.

--David Schonbrunn

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