



San Joaquin Valley
Air Pollution Control District

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KINGS COUNTY
PLANNING AGENCY

June 8, 2001

S2001-0096

Bill Zumwalt, Director
Kings County Planning Agency
Government Center Building #6
1400 W. Lacey Blvd.
Hanford CA 93230

Subject: Revised Draft Dairy Element of the Kings County General Plan Program
Environmental Impact Report

Dear Mr. Zumwalt:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the project referenced above and offers the following comments:

Overall, the Program Environmental Impact Report (PEIR) does a thorough job in addressing the air quality implications of dairy development in Kings County. The District concurs with the impacts identified as significant and unavoidable in the document. The discussion and use of emission factors to quantify the air quality impacts is consistent with the District's understanding of the current state of knowledge in this field. The District recognizes that current emission factors may be inaccurate, but we must rely on the California Air Resources Board (ARB) and US Environmental Protection Agency (EPA) for emission factors used in the attainment planning process. The District has not taken a position supporting or opposing any alternative emission factors. The District supports the policy initiatives and mitigation measures included in the document to reduce air quality impacts. The proposed program to monitor and evaluate dairies over time to demonstrate the effectiveness of the element in protecting the environment is a critical component of the document.

During the review the District identified two areas of the document that should be updated to reflect more recent information. Clarifying discussion is provided below.

Page 4.3-3 ozone nonattainment discussion. The San Joaquin Valley Air Basin failed to meet the 1999 deadline for attaining the federal ozone standard under its "serious" designation. The US Environmental Protection Agency has redesignated the District as a "severe" nonattainment area. This has triggered a new planning process with a

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David L. Crow
Executive Director/Air Pollution Control Officer

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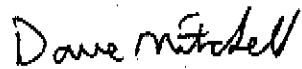
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requirement to attain the ozone standard by 2005. The District will be preparing a new attainment plan over the next year.

Page 4.2-10 carbon monoxide (CO) status. The Fresno Metropolitan area was designated attainment of the state CO standard September 24, 1998. The entire San Joaquin Valley is now in attainment of both state and federal CO standards.

District staff looks forward to working with Kings County to ensure that as new dairies are developed and control technologies are proven, all feasible measures to reduce emissions are introduced. If you have any questions or require further information, please call me at 230-5807.

Sincerely,



Dave Mitchell
Supervising Air Quality Planner

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