The Air Quality Debacle: Leadership Needed!

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I'm going to directly address the San Antonio situation, but it's just one symptom of larger state, local, and national leadership failures. It's a debacle characterized by confusion and controversy on several fronts, including the reliability of the air quality data, the significance of the official air quality standard, and the primary sources of San Antonio's key pollutants.

Most depressing is that hardly any of the officially proposed responses have any relevance to San Antonio's unique air quality problem. Is that because our local officials haven't tailored solutions to San Antonio's unique issues, or because the law prevents them from doing so? To the extent that the Clean Air Act (CAA), as interpreted by the courts and implementers, allows creativity in tailoring mitigation to local conditions, we should expect that of our leaders. To the extent the CAA blocks creativity, our national leadership should move to eliminate the barriers. It could start with something as basic as a re-examination of the definition of a State Implementation Plan credit. Incredibly, among its many flaws, the CAA actually prohibits the consideration of cost as a regulation issue; a serious mistake literally begging for the leadership drive to overcome economically illiterate demagoguery about the incalculable value of life and restore sanity to environmental regulation. If we had that at-all-costs attitude towards the regulation of safety, the government would have to force us to choose between driving armored vehicles at slow speed and walking.

A unique problem? Many areas have the potential for an air quality problem almost every day; places like Houston and Los Angeles. But even before the local response to the non-attainment challenge, San Antonio had (and still has) great air quality about 340 days per year. San Antonio is close to violating the air quality standard only 25 days per day. But of the approximately sixty responses proposed by the Alamo Area Council of Governments (AACOG), only three minor steps address the 'peak-period-only' nature of the problem. The other 57 proposed responses developed through AACOG impose costs every day, but deliver benefits on only a handful of days. That's truly wasteful.

Responses tailored to the San Antonio air quality problem are described at: http://faculty.business.utsa.edu/jmerrifi/books/SAN_ANTONIO_AIR_QUALITY.html