

Chapter 4 Showstopper Concerns (from Bryan Shaw Dec. 8, 2008)

Basis for goals not adequate (i.e., decrease livestock NH₃ to 80% of 1990 emissions, decrease NH₃ emissions from fertilizer applications by 20%). It is reasonable for readers to assume we have fully analyzed our recommendations unless we explicitly state otherwise. Therefore, I recommend we take one of two approaches:

1. Avoid setting arbitrary goals. Perhaps estimate decreased emissions possible due to implementation of existing technologies. However, we should be explicit about whether or not we have analyzed the implications of recommending/requiring full implementation. Remember our earlier discussions about value in evaluating environmental regulations in a holistic manner to account for specifics of region, efficiencies in achieving environmental goal, and avoiding unintended consequences of applying blanket emission reduction goals. The blanket recommendation approach is very similar to the current regulatory process we propose to improve upon.
2. Point out that these are goals that have not been analyzed fully and suggest the issues that need to be considered to develop reasonable goals that allow regional adjustment to target regulations. For example, the needed NH₃ decreases are different in areas where states have demonstrated reductions are needed to achieve PM_{2.5} standards than in areas that are not NH₃ limited. This analysis should be done for each environmental standard.