



Santa Barbara County
Air Pollution Control District

March 20, 2003

Robert D. Fletcher, Chief
Planning and Technical Support Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Ozone Transport Regulation

Dear Mr. ^{BOB}Fletcher

Thank you for the opportunity to review the proposed amendments to ARB's ozone transport regulations. The movement of ozone and ozone precursors throughout California plays an important role in our air pollution control programs and we encourage ARB to actively assess and enforce mitigation strategies for those areas that contribute significantly to the pollution burden of other areas. We have reviewed the draft regulatory language presented at the March 13, 2003, workshop and have the following specific comments.

- Section 70600(a). Incorporating an “all feasible” measure requirement for areas that contribute significantly to downwind areas has merit although it may be confused with the “every feasible” measure requirement under Section 40914(b)(2). Please clarify the how these two requirements interact and if this requirement would equate to a BARCT mandate for stationary sources under local district authority.
- We agree with your proposed approach requiring, in general, that significant transport couples have uniform “not net increase” thresholds for new and modified stationary sources. We also concur with your proposed exception for areas upwind of the South Coast Air Basin, such as the South Central Coast, where, due to the South Coast’s “extreme” classification and the localized nature of the transport impacts from Santa Barbara and Ventura, such a requirement would not be appropriate.
- Section 70600(c). While we understand the rationale behind this requirement, we believe that it will require additional staff time and effort to conduct the proposed process with no guarantee that the impacts of transport will be mitigated. This section should identify ARB’s role in determining if the upwind transport contributors are doing their fair share in mitigating the impacts of their pollution on downwind neighbors and what corrective actions need to be taken.

As a general comment, we would like your help in determining the appropriate level of emission control that Santa Barbara County should be pursuing under that California Clean Air Act. We understand that Santa Barbara County is currently identified as a

transport contributor to the South Coast Air Basin and we recognize that our air pollution can be moved inland by the sea-breezes that frequent our area. Given our dramatic improvements in air quality over the last ten years, however, we would like ARB to re-assess our pollutant contributions to our neighboring air districts using data collected during the Southern California Ozone Study. The results of your technical analysis should be used to determine an appropriate and reasonable level of control that Santa Barbara County should plan for in order to address our role in the formation and transport of ozone and ozone precursors in Southern California.

If you have any questions or comments, please contact me at 805.961.8853, or Kathy Patton at 805.961.8852.

Sincerely,



Douglas W. Allard

cc: Catherine Witherspoon, ARB
Larry Allen, SLOAPCD
Mike Villegas, Ventura APCD
Kathy Patton, SBCAPCD
Tom Murphy, SBCAPCD