

February 19, 2021

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Proposed 2020 Amendments to Area Designations for State Ambient Air Quality Standards

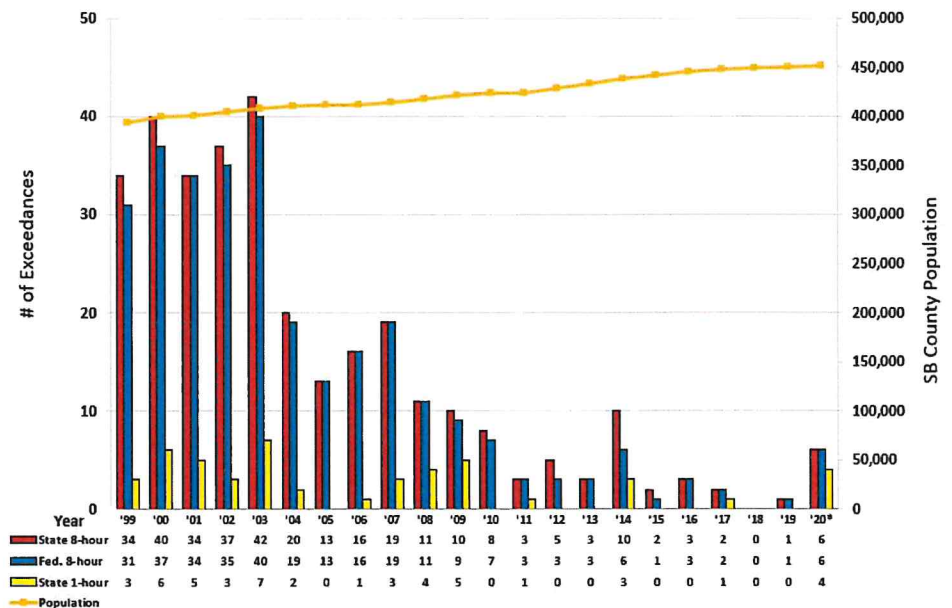
Dear Chair Randolph and Members of the Board,

Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board (CARB) Proposed 2020 Amendments to the Area Designations for State Ambient Air Quality Standards.

In 2019, we were pleased that, after decades of hard work and progress, Santa Barbara County was designated attainment for the State 8-hour ozone standard. We were cautiously optimistic that through all the measures being implemented locally and statewide, we could maintain that status into the future. However, we are aware that weather and air pollutant emissions vary, leading to different pollutant concentration outcomes from one year to the next. Unfortunately, two values recorded in 2019 that are now included in the three-year data set (2017 to 2019) have led to a change in designation back to nonattainment, as indicated in CARB staff proposal.

The District has rigorously followed the triennial air quality plan and update schedule to achieve and maintain the ozone standard by the earliest practicable date, as required by the California Clean Air Act. The local ozone plans serve as our roadmap to develop cost-effective rules and programs to reduce ozone precursors from local sources. Local rules have been adopted, implemented, and enforced to expeditiously attain the State ozone standard. While emissions from stationary sources make up 12% of the total ozone precursor emissions in Santa Barbara County, it is imperative that our local efforts are well supported by CARB's steadfast actions to reduce emissions from sources outside the District's regulatory control such as mobile and area sources.

Over time, the number of exceedances of the State ozone standard in Santa Barbara County has greatly dropped, while population continues to grow. The chart to the right is a great illustration of the success achieved when appropriate steps are taken at both the local and state levels. With



*Data for 2020 is preliminary

the high of 42 exceedances of the State ozone standard in 2003, the District measured a significant reduction in number of ozone exceedances in the 17 years that followed – to the point in 2018 when no exceedances were measured. To maintain this level of success, CARB’s continued efforts to reduce emissions from mobile sources is imperative.

The wildfire impacts that California experienced in the late summer and fall of 2020 were a harsh reminder that weather, climate, and other conditions outside of our control can lead to unhealthy air quality, even when the fires are not occurring in our region. As directed by California Senate Bill 1260 and in coordination with other local agencies, the District has facilitated prescribed burning in strategic locations in Santa Barbara County, with the long-term goal of avoiding catastrophic wildfires. The District also works with CARB to provide a regional cache of portable air quality monitors available for deployment during prescribed burns. Although these efforts have been successful, we acknowledge that there is a long way to go, and we will continue to partner with state and local agencies to improve outcomes. During the 2020 wildfires, the District measured both particulate matter and ozone levels that exceeded state and/or federal air quality standards. The District deeply appreciates CARB’s willingness to work with air districts to demonstrate that these measurements qualify as exceptional events that were affected by catastrophic wildfires.

The District requests CARB’s full support and partnership in addressing our common air quality goals. While CARB’s staff report for the proposed 2020 amendments to area designations characterizes the overall fiscal impact to the District to be relatively minimal over the three-year period, it must be noted that the District is already implementing many other responsibilities without additional revenue. To be specific, CARB recently decided to close two air monitoring stations in Santa Barbara County that provide valuable air quality information for the highest populated regions of the county. In response, the District worked to reallocate resources and take over the ongoing operation, quality assurance, and data submittal for these monitoring stations without any additional revenue to cover this new expense. Another example is CARB’s newly adopted Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants that will result in additional staff time to implement. Once again, the District is required to take on additional responsibilities without additional revenue to compensate for staff time.

Voluntary programs are an important tool to achieve near-term emission reductions from mobile sources, such as ocean-going vessels and on-road and off-road vehicles. However, they require significant funding and staff resources. We request your support to identify funding that will allow the District to successfully implement these critical programs. Together, we will work to both attain and maintain state and federal ambient air quality standards, to help the community better understand emission sources and air quality issues, and to protect our diverse populations from the effects of air pollution.

Sincerely,



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Air Pollution Control Officer

cc: Richard Corey, CARB Executive Officer
Edie Chang, CARB Deputy Executive Officer