



MEMORANDUM

TO: APCD Board Members

FROM: Sara Hunt, Board Clerk (961-8853)

DATE: March 15, 2017

SUBJECT: Public Comments for the March 16, 2017 APCD Board of Directors Meeting

Attached are public comments received through 4:00 p.m. on March 15, 2017 pertaining to agenda Discussion Item #4, "Nonattainment-Transitional Ozone Plan Review".

Sara Hunt

From: Lyz Hoffman
Sent: Wednesday, March 8, 2017 9:55 AM
To: Aeron Arlin Genet
Cc: Sara Hunt; Mary B. Byrd; Ben Ellenberger; Molly M. Pearson
Subject: FW: Keep the 2016 Ozone Plan

FYI. This came to the apcd@sbcapcd.org address.

From: Andrew Philpot [mailto: [REDACTED]]
Sent: Wednesday, March 8, 2017 9:48 AM
To: apcd <apcd@sbcapcd.org>; dwilliams@countyofsb.org; jwolf@countyofsb.org; jhartmann@countyofsb.org; peter.adam@countyofsb.org; steve.lavagnino@countyofsb.org; hollys@cityofbuellton.com; alclark@ci.carpinteria.ca.us; mbennett@cityofgoleta.org; j_mosby@ci.lompoc.ca.us; hschneider@santabarbaraca.gov; apatino@cityofsantamaria.org; jimr@cityofsolvang.com
Subject: Keep the 2016 Ozone Plan

Ladies and Gentlemen,

As a Solvang resident concerned about air quality, I want to urge you all to implement and perhaps *strengthen* the 2016 Ozone Plan you adopted. This is vital to keeping our air healthy and sustainable for all of our citizens - especially children and those with chronic respiratory conditions - for the years to come.

The new administration in Washington is set to roll back many of the safeguards that have been in place for decades; and why is that? For profit, pure and simple. So I ask you: Why did you choose to be a member of this board? Was it not to protect and stand up for your community? This isn't a Republican or Democratic position, but one of civic duty. And why should Santa Barbara County allow FIVE TIMES more pollution than Ventura County? Shouldn't we be leaders in this?

I thank you for your service and look forward to seeing you all at the meeting on March 16th.

Sincerely,

Andrew Philpot
Solvang, CA

Sara Hunt

From: Katie Davis <[REDACTED]>
Sent: Sunday, March 12, 2017 8:46 PM
To: apcd; dwilliams@countyofsb.org; jwolf@countyofsb.org; jhartmann@countyofsb.org; peter.adam@countyofsb.org; Lavagnino, Steve; hollys@cityofbuellton.com; Al Clark; Michael Bennett; j_mosby@ci.lompoc.ca.us; Schneider, Helene; apatino@cityofsantamaria.org; jimr@cityofsolvang.com
Cc: Sara Hunt
Subject: March 16 APCD Board meeting
Attachments: Los Padres APCD Ozone Plan.pdf

Please consider the attached comment on the March 16 APCD Board Meeting Item #4 from the Los Padres Chapter of the Sierra Club.

Please recall that the 2016 Ozone Plan plan was adopted in a unanimous and bipartisan manner and celebrated by your Board on October 20, 2016. There was no opposition.

On October 20, Ben Oakley of oil company ERG commented on the, "tremendous job that the APCD has done...I encourage the adoption of the 2016 Ozone Plan." Staff described the rules as, "technologically feasible and economic." Supervisor Peter Adam made the motion to adopt it.

I would hope that you take no action on item #4 and continue to support the existing 2016 Ozone Plan that you so recently adopted.

Thank you,

Katie Davis
APCD CAC Member



SIERRA CLUB

Los Padres Chapter

Chair

Jim Hines

Vice-Chair

Katie Davis

Secretary

Gerry Ching

Treasurer

Richard Hunt

At Large

Michael Stubblefield

At Large

David Gold

At Large

Alex Pujo

Arguello Group Rep

Rebecca August

SB Group Rep

Martha Sadler

Conejo Group Rep

Hugh Warren

Ventura Network Rep

PO Box 31241,
Santa Barbara CA
93130-1241

Santa Barbara County APCD Board
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
Attn: Board Clerk, Sara Hunt, HuntS@sbcapcd.org

RE: Nonattainment-Transitional Ozone Plan Review (Keep 2016 Ozone Plan)

Dear Santa Barbara County APCD Board Members,

Ozone pollution causes developmental and reproductive harm, asthma attacks, lung tissue redness and swelling, wheezing and coughing, shortness of breath, cardiovascular harm, susceptibility to infections, and premature death. It is particularly harmful for children. Ozone pollution affects the health of Santa Barbara County residents where approximately 49,000 children and adults have been diagnosed with asthma. There are approximately 1500 emergency room visits due to asthma in Santa Barbara County every year.¹

Santa Barbara County doesn't meet state ozone standards and so is required to have a plan for reducing ozone pollution. Unfortunately, the APCD has been slow to act on its own ozone plans. Only one item in the 2013 Ozone Plan was implemented. Thus, the 2016 Ozone Plan is essentially the 2013 Ozone Plan with new dates.

The APCD Board unanimously adopted the 2016 Ozone Plan on October 20, 2016 – just months ago. The APCD Board knew then that the county would be classified as “nonattainment-transitional” this year. Since nothing has changed since then, there is no reason to revisit or suspend this recently adopted plan.

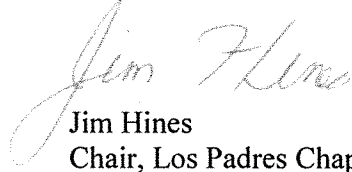
The only thing that has changed since the plan's adoption in October is a significant increase in threats to our air quality. The reason our air quality has improved is because of California's aggressive fuel efficiency standards, which the new head of the EPA may rescind.² We cannot assume continued progress.³ In fact, higher sales of trucks and SUVs have already been hurting fuel efficiency.³ We should assume that the EPA in a Trump administration will lessen enforcement of the Clean Air Act as that is their stated intention. There's an open question about whether we'll have an EPA at all!⁴ We also know that the climate is warming, which will exacerbate ozone pollution effects.

Given this situation, in which the very need to regulate air pollution is being called into question, this board should be talking about whether there is MORE we can do locally to reduce ozone pollution, not less.

The Sierra Club strongly encourages you to maintain and implement the 2016 Ozone Plan. We further suggest that in the event decisions at a national level are enacted that could impair our air quality, you consider adding to the plan and revisiting the New Source Review Standards you adopted last August, which currently allow five times more pollution than Ventura County.

Please act on behalf of the health and well-being of Santa Barbara County's most vulnerable populations and keep and implement the 2016 Ozone Plan.

Regards,



Jim Hines
Chair, Los Padres Chapter of the Sierra Club

¹ "Santa Barbara County Asthma Profile," California Breathing (<http://www.californiabreathing.org/asthma-data/county-asthma-profiles/santa-barbara-county-asthma-profile>)

² "Trump's EPA pick casts doubt on California's power to regulate auto emissions," Los Angeles Times (<http://www.latimes.com/nation/la-na-pol-epa-confirmation-20170118-story.html>)

³ "New-Car Fuel Economy Down Second Year in a Row," Cars.com (<https://www.cars.com/articles/new-car-fuel-economy-down-second-year-in-a-row-1420694164661/>)

⁴ "Lawmaker to propose abolishing EPA," The Hill (<http://thehill.com/policy/energy-environment/317203-lawmaker-to-propose-abolishing-epa>)

LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

March 15, 2017

Chair
Santa Barbara County Air Pollution Control
District Board of Directors
c/o Clerk of the APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110

By Email to: hunts@sbcapcd.org

RE: Item # 4, Nonattainment-Transitional Ozone Plan Review, 3/16/17

Chair and Honorable Members of the Santa Barbara County Air Pollution Control District Board of Directors:

Please accept this letter on behalf of Committees for Land, Air, Water and Species (CLAWS), a local non-governmental organization committed, *inter alia*, to protecting the public's health.

We write to state our concerns over Item # 4, the proposed review of the 2016 state Clean Air Plan and potential for Board direction to staff to weaken air pollution controls that protect the health of our residents and the vigor of our economy.

While Health and Safety Code § 40925.5 authorizes this review, we find the Staff Report and analysis wholly unsatisfactory to enable your Board to consider the issue in a meaningful manner as required by the California Clean Air Act. The APCD is required to consider this review only as part of a detailed quantitative analysis of air quality and emissions trends and with an analysis of the effect of those trends, and any changed control measures, on the attainment and modelled maintenance of the state's ambient air quality standards. The Staff Report provides only a very generalized discussion of trends and falls well short of the level of detail and analysis required to meet the statute's public health purposes.

Significantly, the US EPA announced today plans to review, and likely to attempt to weaken federal vehicle emissions standards and deny California the Clean Air Act § 209 waiver, which would cause a dramatic increase in motor vehicle emissions inventories. See <https://www.epa.gov/newsreleases/epa-reexamine-emission-standards-cars-and-light-duty-trucks-model-years-2022-2025>. As you know, the California emissions standards, as well as the federal motor vehicle emissions standards have and are projected to continue to accomplish substantial reductions in the mobile source emissions inventory and the Motor Vehicle Emissions Budgets. It is premature and risky to consider relaxing Santa Barbara County's stationary source control measure adoption schedule at this juncture, given the unprecedented and reckless actions by EPA to weaken air pollution control measures nationally.

MARC CHYTILO
P.O. Box 92233 • Santa Barbara, California 93190
Phone: (805) 682-0585 • Fax: (805) 682-2379
Email: Marc@lomcsb.com

Additionally, any action such as is contemplated by the review and staff proposal must be accompanied by California Environmental Quality Act compliance. The Staff Report is utterly silent on CEQA review and compliance, and thus your Board lacks the information it needs to even consider this issue if a purpose of the hearing and action is to give direction to staff to weaken air pollution control measures that help protect public health.

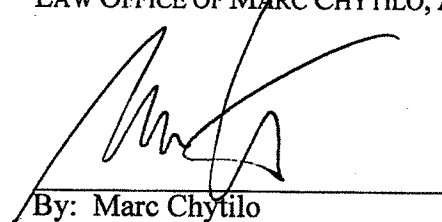
As you know, there is no known safe level of exposure to ozone air pollution. Even compliance with California's ambient air quality standard entails exposure of members of the public, in particular sensitive individuals including seniors, children and persons with respiratory ailments. The six 2016 exceedances might represent statutory compliance, but they also reflect human exposure to unhealthy levels of air pollution, which represents a CEQA impact. Any relaxation of planned air pollution controls represents a potentially significant impact under CEQA.

It is important to note that Santa Barbara County experienced the maximum number of 2016 exceedances permissible under the California Clean Air Act. It is reckless for both public health and from a regulatory perspective to relax stationary source control measures adoption schedules, as the potential for Santa Barbara County to experience additional exceedances in the next three years, and thus be reclassified, is hardly nominal. Given the proposed evisceration of the California motor vehicle emissions standards, the probability of materially degraded air quality throughout the county, including Santa Barbara County, is quite high.

We strongly suggest that your Board not consider this item until it is given more complete information on emissions' and ambient air quality trends, the scale of federal air quality relaxations is known, and CEQA is complied with.

Sincerely,

LAW OFFICE OF MARC CHYTILO, APC



By: Marc Chytilo

CC: APCO (Arlingeneta@sbcapcd.org)