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Santa Barbara County
Air Pollution Control District

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Air and Radiation Docket and Information Center
Docket Number A-2201-31
United States Environmental Protection Agency
401 M Street, SW., Room M-1500 (Mail Code 6102)
Washington, DC 20460

Subject: Implementation of the 8-hour NAAQS – Public Meeting

As Director of the Santa Barbara County Air Pollution Control District, I would like to thank the U.S. EPA staff for holding a public workshop in Phoenix to discuss the issues associated with implementing the new 8-hour National Ambient Air Quality Standard (NAAQS) for ozone.

I appreciate the opportunity to engage in this process and to provide our perspective. Santa Barbara County recently attained the 1-hour standard, and will likely be classified as attainment for the new 8-hour standard. Our air quality has steadily improved over the past decade due to the efforts of federal, state and local governments along with businesses, industry and the public. Implementation of the new 8-hour NAAQS for ozone should follow certain principles to ensure that the residents of Santa Barbara County will continue to enjoy the benefits of breathing cleaner air. These principles include:

- no backsliding so regional air quality improvements can be maintained
- reasonable and expeditious attainment dates
- coordinated efforts on mobile source reductions
- continued funding for clean air projects and programs.

Implementation without Backsliding

Santa Barbara County has historically been nonattainment for the 1-hour NAAQS for ozone and has developed and submitted six State Implementation Plans designed to achieve that standard. These plans have been aggressive and comprehensive, addressing almost every source of pollution that impacts our county. Starting in 1999, we attained the 1-hour NAAQS for ozone and continue to attain the standard through 2001. In order to maintain this standard and continue our progress in reducing ozone exposure, EPA staff must ensure that the implementation of the new 8-hour NAAQS for ozone will not result in any backsliding of the current regulatory programs that are in effect. Any delays or relaxations of existing programs could have a negative impact on our local air quality, especially since we are located adjacent to several more populated and polluted areas in Southern California. EPA needs to ensure that the implementation of the new 8-hour NAAQS for ozone will not delay or disrupt any existing rulemaking schedules or air

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quality programs that could jeopardize the progress that has been made over the past 30 years.

Setting Expeditious Attainment Dates

As we have found in our local air quality planning, clearly defined attainment dates provide a critical framework for areas to assess their local air quality situation and take appropriate actions to remedy standard violations. While dates must allow areas a reasonable amount of time to take appropriate actions, the expeditious attainment of air quality standards is in the best interest of public health. Santa Barbara County's air quality can be significantly impacted by neighboring areas in Southern California and EPA needs to set expeditious attainment dates that recognize the intent of those identified by Congress in Table 1 under Section 181 of the Clean Air Act. Similar to our concerns regarding backsliding, we want to be sure that the implementation guidance for the new 8-hour NAAQS for ozone mandate that the more polluted areas in Southern California continue to make expeditious progress in cleaning their air.

Retain Clean Air Act Transportation Conformity Requirements

As with many areas throughout California, mobile sources emit a significant amount of air pollution in Santa Barbara County. Our 2001 Clean Air Plan shows that on-road mobile sources account for approximately 50 percent of ozone precursor emissions in our onshore area. The Clean Air Act recognizes the relationship between air quality and transportation planning and mandates that planning efforts be coordinated via the transportation conformity process. Transportation conformity requires that transportation plans and programs be consistent with the State Implementation Plan's purpose of achieving expeditious attainment of ambient air quality standards. As a consequence of this requirement, we have forged a strong working relationship with our Metropolitan Planning Organization that integrates our air quality and transportation planning responsibilities thus providing a mechanism to comply with the goals of the Clean Air Act. While the <u>process</u> by which transportation conformity is implemented should be open for discussion and improvement, the Clean Air Act transportation conformity <u>requirements</u> must not be compromised. EPA needs to ensure that the implementation guidance for the new 8-hour NAAQS for ozone continue the spirit of the transportation conformity process and promote continued collaboration and emission reductions in the transportation sector.

Maintain Section 105 and CMAQ Funding

Our ability to implement projects and programs to reduce air pollution in Santa Barbara County is directly linked to the types and amounts of funding on which we are able to draw. There are two very important federal funding mechanisms that our county uses to comply with federal air quality standards – Section 105 Grants and Congestion Mitigation and Air Quality (CMAQ) funding. As we have attained the 1-hour NAAQS for ozone and will likely be attainment for the new 8-hour NAAQS, we are concerned that we may lose future federal funding allocations that have provided us the opportunity to make significant air quality improvements and to keep pace with the air pollution

associated with population growth. We believe that Section 105 and CMAQ funding has been critical to our successes. Since these funding sources are an important tool for both attaining both the 1-hour and 8-hour NAAQS for ozone, we strongly believe that these funding sources not be compromised for areas that have worked long and hard to attain these standards and will need to continue efforts to maintain compliance with these standards. We face many challenges, such as population growth, in our efforts to maintain the federal ozone standard and we need EPA to continue our Section 105 and CMAQ funding at current allocations, not reduced due to our successes at improving air quality.

We look forward to working closely with EPA staff on these important issues. If you have any questions or comments, please contact Tom Murphy of my staff at (805) 961-8857.

Sincerely,

Doug Allard

Douglas W. Allard

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