



Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Kristin Gaspar	District 3
Nathan Fletcher	District 4
Jim Desmond	District 5

October 20, 2020

Richard W. Corey
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Corey:

The San Diego County Air Pollution Control District (District) is submitting to the California Air Resources Board (CARB) the 2020 Attainment Plan and Reasonably Available Control Technology (RACT) Demonstration for the 2008 and 2015 ozone standards (2020 Plan). The San Diego County Air Pollution Control Board (Board) adopted the 2020 Plan on October 14, 2020, for transmittal to the U.S. Environmental Protection Agency (EPA) through CARB for inclusion in the SIP. The Board also authorized the submittal of existing District Rule 61.3.1 (Transfer of Gasoline into Stationary Underground Storage Tanks) for inclusion in the SIP.

Attached are copies of the following documents:

- District's Letter to the Board, dated October 14, 2020.
- Resolution adopting the 2020 Plan and authorizing its submittal along with Rule 61.3.1 to the EPA through CARB for inclusion in the SIP, dated October 14, 2020, pursuant to Section 40727 of the Health and Safety Code.
- Public Notice for the October 14, 2020, public hearing.
- Official affidavit of publication of the Public Notice, dated September 14, 2020, demonstrating compliance with the hearing requirements under 40 CFR §51.102.
- Minutes of the Public Hearing (Board Minute Order), dated October 14, 2020.
- 2020 Plan with attachments, including negative declarations for the 2008 and 2015 ozone standards.
- The 2016 Attainment Plan for the 2008 ozone standard, submitted to the EPA by CARB on April 12, 2017.
- Response to Comments (Workshop Report).
- Initial Study and Negative Declaration for the 2020 Plan pursuant to the California Environmental Quality Act.
- Draft SIP Completeness Checklist.
- Letters in support of the 2020 Plan from the San Diego Regional Airport Authority, Port of San Diego, San Diego Association of Governments, Clean Cities Coalition, Industrial Environmental Association, and Environmental Health Coalition.

There was no opposition to the 2020 Plan's adoption at the October 14, 2020, public hearing. The District requests that CARB submit the 2020 Plan and District Rule 61.3.1 to the EPA for inclusion in the SIP.

In light of this new 2020 Plan addressing the more health-protective requirements applicable to a Severe nonattainment area, the District requests that CARB withdraw the ozone attainment plan submitted to EPA on April 12, 2017, as that plan addressed requirements for only a Moderate nonattainment area.

The District stands ready to provide any additional clarifying information needed. Please direct any questions to Nick Cormier (858-586-2798, nick.cormier@sdcounty.ca.gov) or Kathy Keehan (858-586-2726, kathleen.keehan@sdcounty.ca.gov).

A handwritten signature in black ink, appearing to read "Robert C. Reider". The signature is written in a cursive, somewhat stylized font.

ROBERT C. REIDER
Interim Director

RCR:NC:jm