

September 16, 2026

Chair Lauren Sanchez  
California Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812

*Submitted via the public docket for the Draft Roadmap to Reduce Air Toxics*

**Re: Comments on the Draft 2026 Roadmap to Reduce Air Toxics**

Dear Chair Sanchez and Members of the Board:

The Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to comment on the Draft 2026 Roadmap to Reduce Air Toxics (Roadmap). The District supports the California Air Resources Board's (CARB) effort to establish a unified, long-term strategy for air toxics. The District has administered a comprehensive local air toxics program for more than three decades. This program has produced measurable reductions: of the 51 sources in Santa Barbara County that exceeded health risk significance thresholds in 1991, six remained by 2000, two remained by 2010, and none remained by 2015. The District is now reassessing every AB 2588 facility in the County under OEHHA's 2015 risk assessment methodology, and its New Source Review permitting and CEQA review programs ensure that no new significant risk sources are created. The District appreciates CARB's leadership in bringing air toxics to the forefront of the State's air quality agenda, and looks forward to partnering with CARB to strengthen this program. The comments below identify areas where the Roadmap would benefit from additional accuracy, clarity, or specificity.

**1. The discussion of autobody shops should be corrected to reflect that the isocyanates used in automotive coatings are not carcinogens, and should identify acute non-cancer risk as the driver in this sector.**

*Why We Must Act, Section I — Communities are Profoundly Burdened by Air Toxics and Face Serious Health Impacts: "Autobody Shops" (page 13)*

Pages 13 and 14 state that automotive coatings "can contain chemicals such as parachlorobenzotrifluoride (PCBTF), which is a carcinogen, and isocyanates, which are also carcinogens and specifically target and harm the respiratory system." The isocyanates used as hardeners in automotive coatings are predominantly hexamethylene diisocyanate (HDI) monomer and HDI-based polyisocyanates, the compounds the Roadmap cites at footnotes 38 and 39. The Consolidated Table of OEHHA/CARB Approved Risk Assessment Health Values (September 25, 2025) assigns neither an inhalation cancer unit risk factor; both have noncancer Reference Exposure Levels (RELs) only. Toluene diisocyanate does have a cancer unit risk factor, but it is not the isocyanate class characteristic of automotive refinishing.

The acute REL for HDI monomer,  $0.3 \mu\text{g}/\text{m}^3$ , is low enough that even small, low-throughput shops can generate a significant acute non-cancer hazard index. Given the prevalence of licensed and unlicensed shops throughout the state, which the Roadmap notes, the acute non-cancer pathway rather than cancer risk is the basis for statewide attention in this sector.

**Recommendation.** Revise pages 13 and 14 to describe the isocyanates used in automotive coatings as respiratory sensitizers with low acute RELs rather than as carcinogens, and state that acute non-cancer risk can be significant even at low-throughput facilities.

**2. The Roadmap should define what is meant by “statewide baselines.”**

*Why We Must Act, Section VI — Policy Implementation has not Evolved with Today’s Risk Challenges (page 22); Our Path to Success, Section VI — Modernize Existing Programs Under AB 2588 and AB 1807: “AB 2588” (page 33)*

Pages 22 and 23 state that “now that the program has matured, it could be beneficial to establish statewide baselines to complement local policies.” Page 34 refers similarly to enhancing “statewide consistency” under a modernized AB 2588 program. Neither term is defined. Consistency in methodology, procedure, and public notification and a statewide floor applied to risk thresholds are substantially different undertakings, and districts currently establish those thresholds under authority provided so that implementation could be adapted to local conditions.

**Recommendation.** State whether “statewide baselines” is intended to encompass risk thresholds or is limited to methodological and procedural consistency. If risk thresholds are contemplated, confirm that districts retain authority to adopt more health-protective thresholds.

The District supports statewide consistency in methodology, procedure, and public notification, and would welcome CARB’s assistance in those areas. The District does not support, and would oppose, any use of “statewide baselines” that displaces local risk thresholds or limits a district’s authority to adopt and apply more health-protective ones. A statewide floor set less stringently than a district’s existing threshold would be a backsliding of the protection this community has relied on for more than thirty years, and would discourage the local engagement that has made AB 2588 effective here. The Roadmap should state expressly that any statewide baseline functions as a floor and not a ceiling.

**3. The Roadmap should describe how cumulative risk results will be translated into emission reductions.**

*Our Path to Success, Section VII — Develop Policies and Methods to Evaluate and Address Cumulative Risks from Ambient Exposure (page 35); Our Next Steps, Section II — Other Near-Term Goals: “Cumulative Health Risk Evaluation” (page 38)*

Section VII (page 35) and the Cumulative Health Risk Evaluation near-term goal (page 38) describe developing policies, guidelines, and procedures for modeling community-scale health impacts from air toxics, together with methods to measure the benefits of reducing combined emissions. Both conclude at the point of information, prioritizing action and tracking whether strategies improve public health, without identifying the regulatory authority or mechanism by which a cumulative risk finding would result in an emission reduction. AB 2588 operates facility by facility, and district permitting authority is exercised on individual applications; neither reaches an aggregate community risk level attributable to many sources acting together.

**Recommendation.** Identify what authority CARB anticipates using to act on cumulative risk results (e.g. existing AB 2588 or AB 1807 authority, new statutory authority, district rulemaking, incentive programs, or a combination) and acknowledge where that authority does not presently exist.

The District further recommends that the Roadmap commit CARB to working with CAPCOA to develop modeling protocols capable of evaluating the cumulative impacts of multiple sources simultaneously, and that it identify what thresholds the results of that modeling will be compared against when action is requested or required. A cumulative risk estimate cannot be translated into an emission reduction without an agreed point of comparison, and air districts cannot apply a method whose decision criterion is undefined.

The Roadmap should also address the land use decisions that often create cumulative risk in the first place. CARB's Air Quality and Land Use Handbook: A Community Health Perspective was approved in April 2005 and has not been updated since. Many of the areas across the state that potentially carry high levels of cumulative risk are the result of land use decisions that sited sensitive receptors near existing sources, and those impacts are very difficult to mitigate once the projects are built. Local decision makers need current guidance on how their land use decisions will continue to produce risk impacts that source-by-source controls cannot correct after the fact. The District recommends that CARB update the Handbook and expand guidance to local land use agencies as part of its cumulative risk work, so that better decisions are encouraged going forward.

**4. The statewide strategic plans should be expanded to include diisocyanates and PCBTF.**

*Our Next Steps, Section I — Early Action Items: “Statewide Plans for Acrolein and Ethylene Oxide” (page 37)*

The Early Action Items on page 37 commit CARB to developing statewide strategic plans for acrolein and ethylene oxide (EtO). Page 30 identifies PCBTF and isocyanates alongside those compounds as new air toxics of concern for which emission factor and speciation uncertainty limits source identification, and pages 23 through 25 devote a case study to PCBTF and isocyanates. The Roadmap also notes that PCBTF has an OEHHA-approved cancer inhalation unit risk factor but has not been identified as a TAC, which is a prerequisite for an ATCM, and that South Coast Air Quality Management District is phasing out PCBTF at autobody shops through local rulemaking. Given South Coast's share of the statewide market, coating manufacturers are reformulating for statewide distribution, so the substitution is proceeding without a statewide evaluation of what replaces PCBTF — the “regrettable substitutions” concern the Roadmap identifies on page 34.

**Recommendation.** Include diisocyanates and PCBTF in the statewide strategic plans described under Early Action Items, or explain why these compounds are sequenced behind acrolein and EtO.

**5. The Roadmap should identify a funding strategy for CARB and for air districts.**

*Our Next Steps (page 36); Section II — Other Near-Term Goals: “Air Toxics Emissions Inventory” (page 38)*

The California Toxics Inventory rebuild is framed conditionally — “With additional capacity, CARB would be able to initiate a comprehensive rebuild” (page 38) — and Our Next Steps states that CARB's resource constraints are a limiting factor in how soon it can take action (page 37). At the August 25, 2026 public workshop, CARB confirmed that no dedicated or permanent funding source exists for this work. Several Roadmap commitments (e.g. AB 2588 modernization, expanded reporting and data sharing, and cumulative risk evaluation) will also increase district workload.

**Recommendation.** Identify a funding strategy for both CARB and air districts, and sequence the Roadmap's commitments to match the resources realistically available.

**6. Voluntary emission reduction strategies should include measurable objectives and a regulatory backstop.**

*Our Path to Success, Section VIII — Investigate and Develop Voluntary Emissions Reduction Strategies (page 36)*

The District supports Section VIII and agrees that faster-acting alternatives to ATCM rulemaking are needed. Voluntary programs are difficult to evaluate without defined participation and reduction targets, and districts cannot plan local measures around a program whose expected effect is unknown.

**Recommendation.** State how participation and achieved reductions will be tracked, and what CARB will do if voluntary efforts fall short of the intended reductions within a defined period.

**7. The District supports streamlining TAC identification under AB 1807.**

*Our Path to Success, Section VI — Modernize Existing Programs Under AB 2588 and AB 1807: “AB 1807” (page 34)*

The District supports the option described on page 34 of automatically identifying EICG Appendix A chemicals having an OEHHA health value as Toxic Air Contaminants. This would shorten the interval between a health value and a statewide control measure, and would address the gap the Roadmap identifies with respect to PCBTF.

**Recommendation.** Pursue automatic TAC identification for EICG Appendix A chemicals having an OEHHA health value. The District would support the legislative effort required.

The District appreciates CARB’s engagement with air districts on the Roadmap and looks forward to participating in its development and implementation. If you would like to discuss these comments, please contact David Harris, Engineering Manager, at (805) 979-8311 or [harrisd@sbcpd.org](mailto:harrisd@sbcpd.org).

Sincerely,



Aeron Arlin Genet, Air Pollution Control Officer  
Santa Barbara County Air Pollution Control District

cc: Air Toxics Inbox, California Air Resources Board ([airtoxics@arb.ca.gov](mailto:airtoxics@arb.ca.gov))