

ATTACHMENT B

Additional Public Comment –
Granite Construction Company

February 15, 2024

Santa Barbara County Air Pollution Control District
Community Advisory Council

260 San Antonio Road, Suite A
Santa Barbara, California 93110

From: [QuanHandley, Patty](#)
To: [Timothy J. Mitro](#)
Cc: [Rules; Diggins, Sean](#)
Subject: Comments to Rule 210 "Invoicing Protocols"
Date: Wednesday, January 31, 2024 10:40:29 AM
Attachments: [image001.png](#)
[image002.png](#)

To: Santa Barbara County Air Pollution Control District

I have recently been made aware of the proposed changes to the existing Rule 210 regarding "invoicing protocols." I understand that my comments on this proposed rule are being submitted a month after the date published date for commenting on this proposed rule.

However, I feel it is important to make my concerns known. I am writing specifically in regard to the proposed Day 61 delinquent penalties to be assessed at 25% of the total due. Assessing a 25% penalty is egregious, especially in light of the fact that 3-year permit renewal fees for Granite Construction Company (Granite) where I am employed are in the tens of thousand dollar range. With any corporations with a remote administration site (e.g., Granite's is in Watsonville, CA), there can be delays in requesting payment processing. A 25% penalty exceeds the previous penalty by a factor of 2.5x, and exceeds a standard CPI of 5% by a factor 5x! I believe that in order to promote businesses to remain operating in Santa Barbara County, the Rule 210 invoicing protocols should remain the same with Day 61 delinquent penalties assessed at 10% of the total due... Day 91 at 20%... Day 121 at 30%. I understand that the penalty for Day 151 and beyond should be harsher and include a suspension warning letter.

Table 7.1 – Existing and Proposed Rule 210 Invoicing Protocols

Day #	Existing Rule 210 Protocol	Proposed Rule 210 Protocol
Day 1	Invoice issued.	Invoice issued.
Day 31	Invoice due. Written notice/reminder of invoice.	Invoice due. Written notice/reminder of invoice.
Day 61	Delinquent penalty assessed. (10% total penalty)	Delinquent penalty assessed. (25% total penalty)
Day 91	Delinquent penalty assessed. (20% total penalty)	Delinquent penalty assessed. (50% total penalty)
Day 121	Delinquent penalty assessed. (30% total penalty)	Delinquent penalty assessed. (75% total penalty)
Day 151	Delinquent penalty assessed. (40% total penalty)	Suspension warning letter; and Delinquent penalty assessed. (100% total penalty)
Day 165+	<ol style="list-style-type: none"> 1) Delinquent penalties continue to aggregate for every 30-day period. (100% cap on AB 2588 fees) 2) District may seek permit revocation through the Hearing Board. 	<p>Suspension letter may be issued. District may also seek permit revocation through the Hearing Board at any time.</p> <p><u>If suspended:</u></p> <ol style="list-style-type: none"> 1) Facility may submit an application to reinstate their permit and pay all overdue fees and penalties within 180 days; 2) District staff may inspect the facility and issue a Notice of Violation (NOV) for operating with a suspended permit.

I appreciate the SBCAPCD taking into consideration Granite Construction Company's comments here.

Sincerely,

PATTY QUAN-HANDLEY

Regional Environmental Manager
patty.quan-handley@gcinc.com

 805-879-5316  805-722-0167

 graniteconstruction.com

