

CHAPTER 11

PUBLIC PARTICIPATION

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11. PUBLIC PARTICIPATION

11.1 INTRODUCTION

The public participation process used in the development of this 2010 Clean Air Plan (2010 Plan) was implemented to assure that members of the public, the regulated industry, and government agencies, have an opportunity to provide input into shaping our present and future strategies to clean the air. This chapter describes the process used to obtain public input, itemizes the comments received on the draft plan and responses to public comments.

On May 24, 1994, the Air Pollution Control District Board of Directors (Board) formed the Community Advisory Council (CAC). The purpose of the CAC is to provide advice to the Air Pollution Control Officer (APCO) and the Board in matters relating to attainment planning, development and promulgation of air pollution control rules and other associated policy issues. The CAC considers and renders advice on subjects submitted to them by the APCO, the Board, CAC members, and the public. The CAC is chartered to consider issues related to air pollution planning and rulemaking for which the Santa Barbara County Air Pollution Control District (APCD) has jurisdiction.

The CAC's deliberations and recommendations are to consider, to the extent feasible and reasonable, the effects of APCD planning and rulemaking actions upon public health, the economy, the costs to industry, and the public, along with conformance with the mandates of all applicable local, state, and federal laws. The recommendations of the CAC are advisory in nature and neither the APCO, nor the Board, are bound by CAC recommendations.

Each Board member can appoint two representatives to the CAC. The Board was directed to select CAC members who contain a background related to community interest, professional business, or technical experience. For example a CAC member could have a working knowledge of land use planning, agriculture, petroleum production, medicine, engineering, transportation, environmental conservation, public health, business, or education.

Table 11-1 lists all thirteen Board members and each of their appointed CAC representatives.

TABLE 11-1

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT BOARD <i>BOARD APPOINTED COMMUNITY ADVISORY COUNCIL (CAC) APPOINTEE(S), 2010</i>		
BOARD MEMBER	TITLE	CAC APPOINTEE(S)
Salud Carbajal	Supervisor, First District	John Robinson & Ralph Baxter
Janet Wolf	Supervisor, Second District	Marc Chytilo & Fran Farina
Doreen Farr	Supervisor, Third District	Dr. Ingeborg Cox
Joni Gray	Supervisor, Fourth District	Cliff Dugger & Patrice Surmeier
Joe Centeno	Supervisor, Fifth District	John Deacon & Kevin Wright
Victoria Pointer	Mayor, City of Buellton	
Al Clark	Councilmember, City of Carpinteria	Tom Banigan
Lupe Alvarez	Mayor, City of Guadalupe	Bob Kober
Cecilia Martner	Councilmember, City of Lompoc	Ramzi Chaabane
Helene Schneider	Mayor, City of Santa Barbara	Lee Moldaver & Michael Chiacos
Larry Lavagnino	Mayor, City of Santa Maria	Gary Winters & August Narachi
Ed Skytt	Councilmember, City of Solvang	Mervyn Devine
Edward Easton	Councilmember, City of Goleta	Bill Shelor & Barbara Massey

The APCD has specifically sought out input from the CAC on each element of the 2010 Plan as it was being developed over the past year. Starting in January of 2010, APCD staff presented specific portions of the 2010 Plan for the CAC to provide review and comment. The CAC also provided recommendations regarding policy and other key issues that altered the direction, and ultimately enhanced the plan's contents. The highlights of these CAC meetings and the recommendations that occurred are listed in Section 11.2.

The public notice announced that the 2010 Plan was available for public review. The public comment period was from November 1, 2010 to December 3, 2010. Public notices announcing the date, time, and location of the public workshops were published in area newspapers, including the Santa Barbara News Press, the Santa Maria Times, and the Lompoc Record. A copy of the public notice can be found at the end of this chapter. A copy of all written comments on the 2007 Plan that have been submitted by the public, along with the written responses to these comments, is provided in Section 11.3.

As part of the APCD's continuing commitment to solicit public participation and input into plan

development, a public workshop was also conducted to present the draft 2010 Plan and accompanying environmental analysis. The focus of the public workshop was to allow public commentary on the plan while allowing APCD and Santa Barbara County Association of Governments (SBCAG) staff the opportunity to address concerns and answer questions regarding the plan and its contents. The public comments received verbally during the workshop were responded to at that time and are included in Section 11.4.

Public presentations of the 2010 Plan were conducted at workshops, before the Board at public hearings, and before the Community Advisory Council. A complete listing of all public workshops and plan presentations is contained in **Table 11-2**.

TABLE 11-2

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT		
<i>CLEAN AIR PLAN PUBLIC PRESENTATIONS</i>		
PRESENTATION	LOCATION	DATE
Public Workshop	Days Inn, Buellton	November, 10, 2010
APCD Monthly Board Meeting	Board of Supervisors Hearing Room Santa Barbara	December 16, 2010
APCD Monthly Board Meeting	Board of Supervisors Hearing Room Santa Barbara	January 20, 2011

11.2 COMMUNITY ADVISORY COUNCIL COMMENTS

This section summarizes the highlights of the CAC meetings pertaining to the 2010 Plan. The date of each CAC meeting and the chapter or Plan element that were presented and discussed is listed in the following table. In addition, Table 11-3 documents and presents all changes made to the plan including those that resulted from comments and suggestions made by CAC members during each of the meetings.

COMMUNITY ADVISORY COUNCIL MEETINGS TO DISCUSS 2010 CLEAN AIR PLAN	
MEETING DATE	ITEM(S) PRESENTED
January 27, 2010	Chapter 1 (Introduction) , Chapter 2 (Local Air Quality) & Chapter 3 (Emission Inventory)
April 14, 2010	Chapter 4 (Emission Control Measures)
May 12, 2010	Chapter 7 (State Clean Air Act Requirements) & Chapter 8 (State Mandated Triennial Progress Report and Triennial Plan Revision)
June 9, 2010	Chapter 5 (Transportation Control Measures) & Chapter 6 (Emission Forecasting)
July 14, 2010	Chapter 9 (Greenhouse Gases and Climate Change)
September 8, 2010	Chapter 10 (Transportation Policy, Air Quality and Land Use)
November 10, 2010	Plan Overview/Public Workshop

TABLE 11-3

CHAPTER/SECTION	DESCRIPTION OF CHANGE
EXECUTIVE SUMMARY	
	Figure EX-1 was updated to include 2009 air quality data
	Figure EX-2 and EX-3 were updated to include revised emission forecasts
CHAPTER 1: INTRODUCTION	
	Re-formatted Table 1-1, "Comparison of 1991 AQAP, 1994 CAP, 1998 CAP, 2001 CAP, 2004 CAP, 2007 CAP, and 2010 CAP"
CHAPTER 2: LOCAL AIR QUALITY	
	2009 data has now been included to expand the range of years in Table 2-2 and Figures 2-2A, Figures 2-3 through 2-10,
	Figure 2-2B has been expanded to include population and vehicle miles traveled data for 2008.
CHAPTER 3: EMISSION INVENTORY	
	No changes were made to Chapter 3.
CHAPTER 4: EMISSION CONTROL MEASURES	
SECTION 4.2 EMISSION CONTROL MEASURE MANDATES	<p>The District added a new paragraph after item 2: ‘If an analysis performed during the rulemaking process indicates that the cost-effectiveness of a proposed control measure is too high, the District will not move forward with adopting the new or revised rule.’</p> <p>Staff comment: Staff generally assumes that control measures adopted in other air districts that have been implemented in practice are cost-effective. The text is added for clarity and to explain that the District will not move forward with adopting a new or modified rule if it is found not to be cost-effective during the rule development process.</p>
SECTION 4.2 EMISSION CONTROL MEASURE MANDATES	<p>Staff added the following paragraph before item 4.3: ‘The control measure requirements (e.g., ppm limits, gr/l ROC-content limits) indicated in this 2010 Clean Air Plan are subject to change when the actual rulemaking effort is undertaken. The APCD is using the figures herein to develop emission reduction estimates required to be in the plan by ARB and to give a general indication of today’s limits necessary to comply with the “every feasible measure”</p>

	<p>mandate. However, there could be technological advancements between the adoption of this 2010 Clean Air Plan and when the District begins to undertake the rulemaking effort, which would lower the emission limits or other limits used in this plan. The rulemaking staff will consider such improvements in technology and lower emission limits or other limits found in other air district rules during the rule development process. The state statutory mandate to comply with the requirement to adopt every feasible control measure applies to both the clean air plan and to rule adoptions.’</p> <p>Staff comment: The intent of the new paragraph is to clarify that the emission limits and other limits (e.g., ROC-content limits) shown in the 2010 CAP are the minimum limits and that the limits in the adopted rule may be lower due to advancements in control techniques that could occur between the adoption of the clean air plan and the adoption of the new or revised rule. Further, the "adopt every feasible measure" requirement applies to both the control measures in the plan and the rules adopted to implement those control measures.</p>
<p>SECTION 4.4 EMISSION CONTROL MEASURES ADOPTED DURING THE REPORTING PERIOD (2007-2009)</p>	<p>Table 4-2 modified: The District revised Rule 321 data to show the actual adoption date of September 20, 2010. Also, updated the ROC emission reduction estimates to be 0.5261 for 2020 and 2030.</p> <p>Staff comment: The change in emission reduction estimates stems from new exemptions in Rule 321.B.6.a, b, f, and g.</p>
<p>SECTION 4.5 PROPOSED EMISSION CONTROL MEASURES</p>	<p>Table 4-3 modified: Staff deleted information on the 2010 revision to Rule 321. Also, typographical error on row Rule 352; text for column CAP Control Measure ID should read N-XC-1, not N-XC-6.</p> <p>Staff comment: The Board of Directors adopted amendments to Rule 321 on September 20, 2010. Due to the adoption of amendments to Rule 321, the control measure status changed from proposed to adopted. Staff also revised Table 4-2 to reflect the change in the control measure status.</p>
<p>SECTION 4.5 PROPOSED EMISSION CONTROL MEASURES</p>	<p>Proposed control measure summary on Page 4-10 modified: Staff removed references to the first-round of Rule 321 changes.</p> <p>Staff comment: The change reflects the September 20, 2010 adoption of the first-round of Rule 321 changes.</p>
<p>SECTION 4.5 PROPOSED EMISSION CONTROL MEASURES</p>	<p>On Rule 361, the District revised the discussion to show that the new NOx limit will be 15 ppmv when fired on gaseous fuels. A "Summarized Amended Rule Data for Rule 361" table was also added.</p> <p>Staff comment: The March 31, 2010 draft indicated new limits of 9 and 12 ppmv NOx. Additional research into these limits indicates that they can be achieved but with a sacrifice of thermal efficiency and additional equipment costs. To avoid potentially high cost-effectiveness figures and an increase in fuel use to make up for lost thermal efficiency, the District prefers to propose a general limit of 15 ppmv NOx. Some equipment will have higher NOx limits. The</p>

	summarized rule data was added at the request of CAC members. On November 2, 2010, staff removed erroneous references to the Bay Area AQMD Regulation 9, Rule 7. Also, the San Joaquin Valley APCD rule reference was corrected to be Rule 4307.
SECTION 4.5 PROPOSED EMISSION CONTROL MEASURES	<p>On Rule 342, the District revised the discussion to show that the new NOx limit will be 15 ppmv when fired on gaseous fuels. A "Summarized Amended Rule Data for Rule 342" table was also added.</p> <p>Staff comment: The District used 9 and 15 ppmv NOx limits in the March 31, 2010 draft. For the same reasons stated above, staff now propose that the general NOx limit be set at 15 ppmv, with higher limits for other equipment (e.g., units burning field gas). The summarized rule data was added at the request of CAC members.</p>
SECTION 4.7 CALIFORNIA AIR RESOURCES BOARD CONTROL MEASURES	<p>Table 4-6 modified: The District added the following newer ARB measures to Table 4-6, State Measures Adopted Since the 1994 SIP.</p> <ul style="list-style-type: none"> • In-use off-road diesel-fueled fleets, • Low carbon fuel standard (LCFS), • Small Containers of automotive refrigerant, • Semiconductor operations, • Sulfur hexafluoride emissions in non-semiconductor and non-utility applications • New passenger motor vehicle greenhouse gas emission standards.
SECTION 4.8 INTERNATIONAL MARITIME ORGANIZATION	Staff added text and Table 4-7 and 4-8 on the International Maritime Organization Marine Environmental Protection Committee treaty information on reducing NOx emissions from marine vessels and limiting their fuel sulfur content.
CHAPTER 5: TRANSPORTATION CONTROL MEASURES	
SECTION 5.2.1 STATE ACT PERFORMANCE MEASURE	Added Figure 5-3 that shows the Vehicle Miles Traveled per Capita in Santa Barbara County between the years 1988 and 2008 (on page 5-28). Figures occurring after this were re-numbered accordingly.
SECTION 5.3 TRANSPORTATION CONTROL MEASURES	<p>Some TCMs were deleted from Table 5-3 (pages 5-13 through 16) in response to CAC comments that some TCMs listed were out-of-date and stale. The following measures were removed from Table 5-3 because they were deemed to not have enough SOV reduction potential to reduce emissions appreciably Countywide. Staff confirmed that there were no emission reductions quantified in the Plan for these projects. Note that these projects were completed and are currently in place:</p> <ul style="list-style-type: none"> • <i>Crosstown East/West Bikelane couplet</i> (City of Santa Barbara, 1994 CAP) • <i>Shoreline Dr./Cabrillo Blvd. Bikeway</i> (City of Santa Barbara, 1994 CAP) • <i>El Capitan Ranch Bikeway</i> (County of Santa Barbara, 1994 CAP) • <i>Via Real Class II Bikeway – Cravens Ln. to Padaro</i> (County

	<p>of Santa Barbara, 1998 CAP)</p> <p>The following projects were removed because they were implemented and later dropped:</p> <ul style="list-style-type: none"> • <i>Natural Gas Garbage Truck, Roll Off Bins, Compactor</i> (City of Lompoc, 1998 CAP) • <i>CNG Bus Purchase</i> (City of Santa Maria, 1998 CAP) <p>Also, the County of Santa Barbara’s <i>Electric Vehicle Regulations</i> measure was dropped. The measure was initially implemented in the 1998 CAP in anticipation of higher utilization of electric vehicles. The anticipated demand did not materialize as envisioned, so the measure was dropped.</p> <p>Also typo was corrected on the status of the Enhanced Commuter Rail Service measure. The status was changed from “Service On-Going” to “Pending”.</p>
<p>SECTION 5.3 TRANSPORTATION CONTROL MEASURES</p>	<p>Based on input from various CAC members, there may be some potential co-benefits for passenger vehicle ozone emission reductions related to the implementation of SB 375. SBCAG is recommending that the potential for co-benefits be further studied within the forthcoming Sustainable Community Strategy and are therefore recommending this as a TCM for further study in the 2010 CAP.</p> <p>The following text was added to on page 5-4:</p> <p>“The other measure proposed for further study, the Activity Centers measure, arose from Senate Bill 375, which was passed in 2008 by the California legislature. SB 375 places new regional planning responsibilities on Metropolitan Planning Organizations (MPO) like SBCAG. The bill is intended to help meet the state’s GHG emission reduction goals in AB 32 through regional transportation and land use strategies to reduce emissions from car and light-duty truck travel. SB 375 ties the regional housing and transportation planning and land use planning processes together by mandating the preparation of a Sustainable Communities Strategy (SCS) in the Regional Transportation Plan. The SCS will be prepared to show how the region will meet targeted reductions in GHG emissions. The targeted reductions (which were set by ARB’s Regional Targets Advisory Committee in September 2010) will be incorporated into SBCAG’s SCS in the next Regional Transportation Plan update (currently scheduled for early 2013).</p> <p>The SCS requirements represent an opportunity to improve the link between transportation and land use planning. One component of the SCS includes analyzing the feasibility of transit priority projects that will contribute to reducing regional GHG emissions. SB 375 sets criteria for what can be considered a transit priority project, such as;</p> <ul style="list-style-type: none"> • minimum residential/commercial mixed use sizes, • close access to major transit stops and high quality transit

	<p>corridors, and</p> <ul style="list-style-type: none"> • compliance with extensive environmental and land use criteria. <p>The criteria for transit priority projects were written in a way to incentivize their development. CEQA exemptions (for growth-inducing impacts and project-specific and cumulative traffic impacts) could make development of these projects less expensive than non-transit priority projects. In addition, identification of potential development sites in the SCS can help in identifying locations for local jurisdictions to address State housing mandates.</p> <p>The concept of transit priority projects and their evaluation in the SCS represents a good example of local adoption of ordinances that would enhance transit development and development of mixed use projects, thus representing an opportunity for further study of the Activity Centers TCM under SBCAG’s new responsibilities under SB 375. The SCS will identify potential locations for transit priority projects based on the criteria outlined in the statute. In addition, the SCS will also capture co-benefits, such as reductions in criteria pollutants. SBCAG will analyze the potential for criteria pollutant reductions in its upcoming SCS, therefore, it is proposed for further study in the 2010 Plan.</p> <p>The TCM was added to Table 5-5 also.</p>
<p>SECTION 5.3 TRANSPORTATION CONTROL MEASURES</p>	<p>Based on questions and comments at the June CAC meeting, further clarification on the rejection of the bus idling TCM was provided. The following sentence was added to the last paragraph in Section 5.3 on page 5-5:</p> <p>“The presence of the State regulation would make it difficult to implement a local rule, therefore, it is proposed for rejection in the 2010 Plan.”</p>
<p>SECTION 5.4.1 ON-ROAD ACTIVITY DATA INPUTS</p>	<p>The following sentence was revised on Page 5-7:</p> <p>“This ethnic age cohort will age and turn into licensed drivers, but their driving characteristics may differ from the past drivers that were dominated by the white ethnic group prevailing patterns.”</p>
<p>CHAPTER 6: EMISSION FORECASTING</p>	
<p>SECTION 6.3 EMISSION INVENTORIES</p>	<p>Changes occurred to the Santa Barbara County emission inventory for 2020 and 2030 due to updated data from ARB’s State Implementation Plan model software. Specific revisions occurred to the Area-Wide Sources emission categories of Consumer Products, Architectural Coatings and Solvents, Pesticides/Fertilizers, Residential Fuel Combustion, Fires, and Managed Burning and Disposal. Changes were also made to the Other Mobile Source categories of Trains, Ships and Commercial Boats, Recreational Boats, Off-Road Recreational Vehicles, Off-Road Equipment, Farm Equipment, and</p>

	<p>Fuel Storage and Handling.</p> <p>For the OCS inventory, changes occurred to the Ships and Commercial Boats category as a result of estimates from the proposed ARB the Commercial Harbor Craft regulation.</p> <p>These inventory changes resulted in modifications to Section 6.3 “Emission Inventories”, Table 6-5, “Santa Barbara County”, Table 6-6, “Outer Continental Shelf”, and Figures 6-1 through 6-5 that illustrate these emission forecasts. (These were previously displayed as Tables 6-3 and 6-4, respectively).</p> <p>On Page 6-4, second to last paragraph, last sentence should read “Area-wide NOx emissions are predicted to <u>increase</u> from 0.91 tons per day in 2007 to 1.32 tons per day by 2030”.</p>
SECTION 6.4.2 2008 AMENDMENTS TO MARPOL ANNEX VI	Table 6-3, “Annex VI Oxides of Nitrogen (NOx) Emission Standards” and Table 6-4, “Annex VI Fuel Sulfur Content Requirements” were added.
CHAPTER 7: STATE CLEAN AIR ACT REQUIREMENTS	
	No changes were made to Chapter 7.
CHAPTER 8: STATE MANDATED TRIENNIAL PROGRESS REPORT AND TRIENNIAL PLAN REVISION	
	No changes were made to Chapter 8.
CHAPTER 9: GREENHOUSE GASES AND CLIMATE CHANGE	
	Changed title of chapter from ‘Climate Protection’ to ‘Greenhouse Gases and Climate Change’.
9.3.1 STATE OF CALIFORNIA LEGISLATION	Clarification of ARB GHG reporting thresholds and facility-types required to report.
9.4.1 METHODOLOGY	The addition of power mixes by energy resource for each electrical utility.
9.4.2 2007 CO ₂ EMISSION INVENTORY	Added text explaining zero emissions in some of the categories.
	The inclusion of Global Warming Potentials in Table 9-1
	Split recreational boats between OCS and onshore (state tidelands) in Table 9-2 and Table 9-3
	The addition of a new Figure 9-3 that shows CO ₂ emissions without the inclusion of emissions attributed to electricity consumption.
	Added Figure 9-5 that shows per capita electricity usage in Santa

	Barbara County.
CHAPTER 10: TRANSPORTATION POLICY, AIR QUALITY AND LAND USE	
	The CAC recommended that a Land Use chapter be included in the Plan. With the addition of the land use chapter, Public Participation will now be Chapter 11

11.3 2010 PLAN PUBLIC WORKSHOP

This section summarizes all public comments and staff responses from the public workshop. The public workshop was held on November 10, 2010 in Buellton in conjunction with the normally scheduled CAC meeting. Comments from the workshop and the responses to these comments are provided below.

Comments Received During the November 10, 2010 Workshop and Community Advisory Council Meeting

John Deacon:

- 1) *In Table 4-3, under the column titled, “Year for the Emission Reduction Estimate,” do the years shown correspond with the compliance date of the control measure?*

No, the years in that column represent the forecast year for the particular control measure. The District indicates in several places that the plan uses two forecast years: 2020 and 2030. (Footnote “a” in Table 4-2 explains that the 2010 Clean Air Plans uses forecast years 2020 and 2030 only.) For example, a 2020 date in Table 4-3, indicates the estimated emission reductions from the specified control measure are accounted for in the 2020 forecast inventory.

Regarding compliance deadlines and full implementation dates, these will depend on when the control measures are adopted and the type of control measure: retrofit or point of sale. Generally, the District incorporates a one-year compliance deadline after the date of adoption of a control measure. In the case of a point of sale rule, although retailers are complying within one year, we expect to achieve full implementation several years after adoption due to normal turnover rates for existing equipment.

For a retrofit rule like Rule 342, it will have a compliance deadline of one year from the date of adoption. Thus, if the modified rule is adopted in January 15, 2012, the compliance deadline will be January 15, 2013.

Marc Chyttilo:

- 2) *Recommended language change in Chapter 10 Section 10.4 (Land Use Concepts for Consideration by County and City Planning Agencies) specifying that land use concepts are specific to each community and those communities should conduct their own analyses when considering air quality strategies.*

The language in Section 10.4 of Chapter 10 has been changed to reflect these suggestions.

- 3) *Commented that Figure 9-4 did not specify that the data presented in the Figure are for Santa Barbara County.*

The figures have been amended to show that the data are specific to Santa Barbara County.

Bill Shelor:

- 4) *Recommended that the text in Section 10.2 be amended to read that "...the tendency of retired workers to stay in the area" rather "on the South Coast."*

The text has been modified as suggested.

Tony Lucas (on behalf of VAFB):

- 5) *Asked that language in Chapter 9 specify that the chapter is informational only and is not intended to address attainment for the state ozone standard.*

In addition to stating that the chapter is informational only and not regulatory in nature, language has been added that specifies that Chapter 9 is not intended to address the state ozone standard.

Dr. Inga Cox

- 6) *Pointed out that the conclusions in Chapter 3, Emission Inventory, were incorrect by stating that the largest contributor to ROC emissions in the Annual Emission Inventory for the Outer Continental Shelf was from the other mobile sources.*

The conclusions have been changed accordingly and now state that largest contributor of ROC emissions in the Annual Emission Inventory for the OCS is from natural sources.

- 7) *Asked why emissions have changed slightly from those presented at an earlier CAC meeting.*

The on-road emission inventory was updated from when the emission inventory was presented at the January 2010 CAC meeting. The updated data slightly changed the percent contribution of emissions for each category.

Patrice Surmeier

- 8) *Suggested that emissions from electricity consumption be footnoted to point out that the emissions are not generated in Santa Barbara County.*

The electricity consumption emissions presented in Table 9-2 have been footnoted as suggested.

11.4 DECEMBER 16, 2010 APCD BOARD HEARING COMMENTS

This section provides comments received on the 2010 Plan during the December 16, 2010 Board Hearing along with accompanying APCD staff responses to these comments.

Supervisor Carbajal:

- 1) *Asked how EPA's decision to delay the issuance of a revised federal 8-hour ozone standard impacts this plan.*
 - The 2010 Plan addresses the state 8-hour ozone standard only and any decision by EPA regarding a new federal 8-hour ozone standard will have no impact on this plan. A revised federal 8-hour ozone standard, however, would likely require additional planning efforts in order to address a revised standard.

Supervisor Wolf:

- 2) *Commented that marine shipping is a significant source of CO₂ emissions on the Outer Continental Shelf.*
 - Comment noted. Marine shipping is a large source of greenhouse gases and comprises over 80% of the CO₂ emissions attributed to sources on the Outer Continental Shelf.
- 3) *Remarked that the county had submitted a letter after reviewing the draft EIR and many of the comments dealt with Venoco-Ellwood Marine Terminal. Were those comments ultimately addressed in the final Plan?*
 - The District has received comments from the County Planning and Development on the Notice of Preparation for a Draft Environmental Impact Report, which include comments that are specific to Venoco-Ellwood Marine Terminal. In addition, comments were submitted to the District by the County on the draft EIR. The District will respond appropriately to each of the comments submitted by the County in the final EIR.

11.5 WRITTEN COMMENTS AND RESPONSES ON THE 2010 PLAN

This section provides all written comments received on the 2010 Plan and accompanying APCD staff responses to these comments.

Memorandum

To: Santa Barbara County Air Pollution Control District (SBCAPCD), Community Advisory Council (CAC)

From: Kevin Wright, CAC Co-Chair

Subject: Recommendations Concerning Proposed 2010 Clean Air Plan (CAP), Chapter 4, Emission Reduction Measures

At the April 14, 2010 CAC meeting I presented the following recommendations concerning proposed emission reductions for oxides of nitrogen (NO_x) emissions associated with various external combustion rules, and Reactive Organic Compound (ROC) emissions associated with various solvent and coating rules.

Note: During most of my comments during the meeting. I calculated the expected emission reduction as tons/year, using a calculation of the listed tons/day multiplied by 365 days per year. Staff mentioned that this is not always the method that this annual emissions estimate is calculated, so I will limit my comments to the tons/day estimates listed in Chapter 4 for the control measures.

ROC Emission Reductions

I recommended the following concerning the ROC rules proposed for the CAP, Chapter 4, Emission Reduction Measures:

- The total emission reductions from the proposed ROC rules in the CAP are estimated by the SBCAPCD as **0.7423 tons/day**.
- Rule 321 (0.5335 tons/day) should be included in the CAP according to the 2010 adoption schedule. When fully implemented, Rule 321 would achieve 72 percent of the total ROC emission reductions contained in the CAP. I mentioned that I agreed with the current proposal to reduce the solvent limit to 50 grams/liter (g/l), but that I had major problems with other provisions of the rule including “housekeeping requirements”. The SBCAPCD confirmed that the majority of the ROC emission reduction in this proposal would be from the reduction in the ROC solvent limit.
- Due to the fact that Rule 323, Architectural Coatings, and Rule 354, Graphic Arts, are listed as California Air Resources Board (CARB) model rules, I supported their inclusion into the CAP. Rule 323 and Rule 354 are estimated to reduce 0.0887 and 0.0579 tons/day respectively. These rules would account for approximately 20 of the projected emission reductions listed in Chapter 4.
- Therefore, by including Rule 321, 323, and 354 into the CAP, approximately 92 percent of the projected ROC emissions reductions would be achieved.

- Rule 337, Aerospace and Aircraft Coatings, is estimated to reduce 0.0006 tons/day. Based upon significant figures, the estimated emission reductions from this rule would essentially be zero. Therefore, the rule revision should be removed from consideration.
- Rules 330, Metal Parts Coating; Rule 351, Wood Products Coatings; Rule 349, Polyester Resin Operations; Rule 353, Adhesives and Sealants total 0.034 tons/day for approximately 4.5 percent of the total ROC emission reduction estimate. These proposed rules will primarily impact small businesses in Santa Barbara County which have been hit hard by the economy (e.g. Hand crafted custom surfboards-Polyester resin, Antique furniture refinishers, etc). Chapter 4 states that the feasibility of implementing these rules is based upon the fact that similar rules have been implemented in the South Coast Air Quality Management District (SCAQMD). However, I noted that huge coating industries exist in the Los Angeles Basin, including wood furniture manufacturing, metal products and coating operations, and aerospace and aircraft manufacturing. Therefore, the feasibility of these rules and the small emission reductions achieved do not substantiate the need for the rules, and they should be removed as candidate rules from Chapter 4.
- Finally, the SBCAPCD is proposing to again revise Rule 321, Solvents and Solvent Machines, in the 2013 to 2015 timeframe. This proposal would again lower the solvent limit to 25 g/l from the proposed 50 g/l that is contained in the current Rule 321 rulemaking. This will result in an estimated 0.0277 tons/day or approximately 3.7 percent of the total ROC emission reduction estimated in Chapter 4. Due to the small percentage of emission reductions in this proposal and the difference in solvent usage in Santa Barbara County as opposed to the use in the SCAQMD, I also recommended that this rule not be considered for inclusion in Chapter 4.

NO_x Emission Reductions

Rules 342, 352, 360, and 361 are NO_x emission control rules that are proposed to be included in Chapter 4. All of these rules regulate external combustion sources (boilers, steam generators, and thermal fluid units (heater treaters). My recommendations provided at the CAC meeting concerning these rules were as follows:

- The total emission reductions from these proposed NO_x rules in the CAP are estimated by the SBCAPCD as **0.0961 tons/day**.

Rule 352 and 360:

- Rule 352, Residential Water/Space Heaters, and Rule 360, Large Water Heaters and Small Boilers (Rated > 75,000 British Thermal Units (BTU)/hr < 2 Million (MM) BTU/hr, have been designated by the SBCAPCD as “prohibition by sale” rules. Therefore, emission reductions are insured by the manufacturer. I stated that I would recommend that these two rules be included into Chapter 4. According to SBCAPCD estimates, the total NO_x emission reductions from these two rules is 0.0748 tons/day or approximately 78 percent of the total NO_x emissions reductions to be achieved in Chapter 4.

Rule 342:

- Rule 342 controls emissions from external combustion units rated > 5 MMBTU/hr < 20 MMBTU/hr. To achieve estimated emission reductions of 0.0142 tons/day the SBCAPCD is proposing to set NO_x emission limits as follows:
 - 9 parts per million (ppm) for most units
 - 15 ppm for steam generators
 - 30 ppm for thermal fluid units (heater treaters)
 - Higher limits than 9 ppm for atmospheric units

- These proposed Rule 342 emission limits are consistent with SCAQMD Rule 1146. However, the San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4306 controls these units as follows:
 - > 5 MMBTU/hr < 20 MMBTU/hr: 15 ppm
 - > 20 MMBTU: 9 ppm
 - Oilfield thermal fluid units < 65 MMBTU/hr: 30 ppm
 - Oilfield thermal fluid units > 65 MMBTU/hr: 25 ppm

- I recommended the limits listed below which are consistent with SJVAPCD Rule 4306 and the draft 2007 SBCAPCD CAP:
 - > 5 MMBTU/hr < 20 MMBTU/hr: 15 ppm
 - 15 ppm for steam generators
 - > 20 MMBTU: 9 ppm
 - Thermal fluid units: 30 ppm
 - Higher limits than 9 ppm for atmospheric units

- My recommendation for Rule 342 will still result in emission reductions, although less than the SBCAPCD estimate.

Rule 361:

- Rule 361 controls emissions from external combustion units rated > 2 MM BTU/hr < 5 MMBTU/hr. To achieve estimated emission reductions of 0.0072 tons/day, the SBCAPCD is proposing to set NO_x emission limits as follows:
 - 9 parts per million (ppm) for most units
 - 15 ppm for steam generators
 - 30 ppm for thermal fluid units (heater treaters)
 - Higher limits than 9 ppm for atmospheric units

- These proposed Rule 361 emission limits are consistent with SCAQMD Rule 1146.1 and SJVAPCD Rule 4307. However, I mentioned to the CAC that the number of units and baseline emissions in the SJVAPCD and the SCAQMD were magnitudes greater than similar units operating in Santa Barbara County. For example, prior to their implementation of Rule 4307, The SJVAPCD listed 1,179 units subject to

emission reductions with a baseline of 8.6 tons/day. For comparison, I noted that the SBCAPCD listed NO_x emissions for all stationary sources in their 2007 emission inventory included in the 2010 CAP as 8.19 tons/day.

- I also mentioned that the CAC and industry made an agreement with the SBCAPCD in the 2007 CAP and in the Rule 361 rulemaking SBCAPCD Board adoption letter that emission reductions for this rule would be delayed until 2020 with an emissions limit of 30 ppm. Industry was required to submit Permit to Operate (PTO) applications to the SBCAPCD without control, which provided the SBCAPCD with an inventory of the units as well as permit fee revenues that assisted the SBCAPCD in not raising fees or having to delve further into reserves.
- I recommended to the CAC that the SBCAPCD include in the 2010 CAP emission reduction measures that reflected agreements made by the SBCAPCD in the 2007 CAP and in the Rule 361 rulemaking documentation (e.g. A 30 ppm emission limit implemented in 2020).
- My recommendation for Rule 361 will still result in emission reductions, although less than the SBCAPCD estimate.

APCD RESPONSE TO PUBLIC COMMENTS

Comment: ROC Emission Reductions: Delete the proposed control measures that would add solvent cleaning requirements to operation-specific Rules 330, 337, 351, 349, and 353.

Response: The five rules suggested for removal as proposed control measures are included in the federal 2007 CAP. Regardless of how little their projected emission reductions are, they cannot be eliminated from the 2010 CAP. The District decided to modify these rules to meet the State attainment plan requirement to *adopt every feasible control measure* in the 2001 CAP and has carried them forward through each subsequent plan.

The eight solvent-type rules being carried over from the 2007 CAP include:

1. PAR 321 - Solvent Cleaning Machines and Solvent Cleaning (currently underway)
2. PAR 330 - Coating of Metal Parts and Products
3. PAR 337 - Coating of Aircraft or Aerospace Vehicle Parts and Products
4. PAR 351 - Coating of Wood Products
5. PAR 349 - Rule Polyester Resin Operations
6. PAR 353 - Adhesives and Sealants
7. PAR 354 - Graphic Arts
8. PAR 323 - Architectural Coatings

Comment: ROC Emission Reductions: Delete the proposed control measure to reduce the Rule 321 solvent limit to 25 g/l.

Response: The District considers it necessary to adopt *every feasible control measure* consistent with State attainment plan requirements. Reducing the Rule 321 ROC-content limits in the 2013 - 2015 timeframe to be similar to those found in other air districts will satisfy that mandate.^a In addition, during the Rule 321 revision process completed in 2010 the District received letters from both the ARB and EPA indicating that Rule 321 should have ROC-content limits lower than were adopted. Thus, we will not delete this proposed measure.

^a The control measure requirements (e.g., grams per liter ROC-content limits) indicated in the 2010 Clean Air Plan are subject to change when the actual rulemaking effort is undertaken.

Comment: NOx Emission Reductions: On Rule 342, the same tiered approach found in the San Joaquin Valley Unified APCD Rule 4306 should be used. On Rule 361, the proposed control measure to lower NOx limits should be deleted from the 2010 CAP.

Response: The District has reconsidered the proposed amended Rule 342 and 361 limits to meet the requirement to adopt *every feasible control measure*. We have decided that a flat 15 ppmv NOx limit that is not tied to equipment size (with the 30 ppm limit for thermal fluid heaters) is appropriate. Burner manufactures have met a 9 or lower ppm NOx limit, but have incurred higher costs and lower thermal efficiency. To avoid increased fuel use to make up for the loss in thermal efficiency and to maintain cost-effectiveness, the District now proposes a 15 ppm NOx limit.^a The 15 ppmv NOx limit is consistent with the Bay Area AQMD Reg. 9, Rule 7 (adopted July 30, 2008). The District modified Chapter 4 to show a 15 ppm NOx limit for Rule 342 and Rule 361.

Rule 361 will maintain the current calendar year 2020 final compliance deadline for existing units. By 2020, all affected units will need to comply with the revised NOx limits. We are not aware of any agreements with the CAC to retain a 30 ppmv limit, and the SBCAPCD Board adoption letter dated January 17, 2008 does not contain any such commitment.

^a The control measure requirements (e.g., ppm limits) indicated in the 2010 Clean Air Plan are subject to change when the actual rulemaking effort is undertaken.

11.6 PUBLIC NOTICE



PUBLIC NOTICE

Draft 2010 Clean Air Plan Public Comment Period Starts November 1, 2010

SUMMARY: The Santa Barbara County Air Pollution Control District (District) has prepared the Draft 2010 Clean Air Plan. As required by the California Clean Air Act, the Draft 2010 Clean Air Plan provides a three-year update to the 2007 Clean Air Plan and will be submitted to the California Air Resources Board for approval. Previous plans developed to comply with the California Clean Air Act include the 1991 Air Quality Attainment Plan, 1994 Clean Air Plan, 1998 Clean Air Plan, 2001 Clean Air Plan, and 2004 Clean Air Plan. The Draft 2010 Clean Air Plan is not required to address any Federal Clean Air Act requirements. The Draft 2010 Clean Air Plan includes previously adopted air pollution emission control measures along with newly proposed and further study emission control measures.

PUBLIC REVIEW: The Draft 2010 Clean Air Plan will be available for public review and comment for 30 days, beginning November 1, 2010 until November 30, 2010. The Draft 2010 Clean Air Plan is available on the District website at www.sbcapcd.org/cap.htm and at our two District offices:

1. 260 N. San Antonio Road, Suite A, Santa Barbara
2. 301 E. Cook Street, Suite L, Santa Maria

PUBLIC WORKSHOP: A public workshop has been scheduled to present the Draft 2010 Clean Air Plan in order to receive public comments. The general public is invited to attend at the following time and location:

Wednesday, November 10, 2010 6:30 pm Days Inn: Windmill Room 114 E. Hwy 246, Buellton

Following the public workshop, there will be a meeting of the APCD Community Advisory Council to discuss the Draft 2010 Clean Air Plan, and solicit their recommendation for District Board adoption.

WRITTEN COMMENTS:

Written comments on the Draft 2010 Clean Air Plan should be submitted to:

- Ron Tan, Planning and Technology Supervisor,
 - Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd, Suite A, Santa Barbara, CA 93110-1315.
 - The comment period closes November 30, 2010.

For more information, please contact:

- Ron Tan at (805) 961-8812 or rlt@sbcapcd.org or
- Jim Fredrickson at (805) 961-8892 or fredricksonj@sbcapcd.org