

CHAPTER 12

PUBLIC PARTICIPATION

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12. PUBLIC PARTICIPATION

12.1 INTRODUCTION

The public participation process used in the development of this 2001 Clean Air Plan (2001 Plan) was implemented to assure that the demands of clean air placed on us by the plan are reasonable and capable of being achieved. Also, it is important 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.

A specific group of people has been organized to serve the goal of providing input on the development of clean air plans. They are known as the **Community Advisory Council**. 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 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 12-1 lists all twelve

Board members and each of their appointed CAC representatives.

The APCD has specifically sought out input from the CAC on each element of the 2001 Plan as it was being developed over the past year. Starting in July of 2000, APCD staff presented specific portions of the 2001 Plan for the CAC to review and comment on. 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 12.2.

As part of the APCD's continuing commitment to solicit public participation and input into plan development, public workshops were also conducted to present the concepts of the 2001 Plan and the implications of its proposed control measures on the residents and business community of Santa Barbara County. The focus of the public workshops 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 workshops were responded to at that time and are included in Section 12.4. 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.

The public notice announced that the 2001 Plan was available for public review. The public comment period was from August 1, 2001 to August 31, 2001. A copy of all written comments on the 2001 Plan that have been submitted by the public, along with the written responses to these comments, is provided in Section 12.3.

Given that Clean Air Plans establish new on-road mobile source emission budgets that all future regional transportation plans and programs must be compared to and found to conform with, input from SBCAG's Technical Transportation Advisory Committee (TTAC) was also sought during the development of the 2001 Plan. In December of 2000 and January of 2001, SBCAG staff briefed TTAC on the role of transportation control measures (TCMs) and attempted to

solicit new candidate projects or programs for inclusion in the 2001 Plan. In September 2001, TTAC approved the on-road mobile source estimates and the TCM package included in the 2001 Plan. These TTAC meetings provided additional opportunities for public input. Pursuant to the Memorandum Of Understanding between the APCD and SBCAG, the transportation elements of the 2001 Plan were formally approved by the SBCAG board at a noticed public hearing in October, 2001.

Public presentations of the 2001 Plan were conducted at the 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 12-2.

12.2 COMMUNITY ADVISORY COUNCIL COMMENTS

This section summarizes the highlights of the CAC meetings pertaining to the 2001 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, primary questions, comments, suggestions, and policy direction that staff received from the CAC members are included.

Community Advisory Council Meetings to Discuss 2001 Clean Air Plan	
Meeting Date	Item(s) Presented
July 12, 2000	Chapter 1 (Introduction) & Chapter 2 (Local Air Quality)
October 11, 2000	Future Year Activity Indicators
February 21, 2001	Chapter 3 (Emission Inventory) & Chapter 4 (Emission Control Measures)
March 14, 2001	Chapter 8 (Implementation Support Activities) & Chapter 10 (State and Federal Clean Air Act Requirements)
April 11, 2001	Chapter 6 (Emission Forecasting)
June 13, 2001	Chapter 4 Revisions & Chapter 7 (Redesignation Request and Maintenance Plan)
July 11, 2001	Executive Summary, Chapter 5 (Transportation Control Measures), Chapter 9 (Land Use Strategies) & Chapter 11 (State Mandated Triennial Progress Report and Triennial Plan Revision)
August 8, 2001	Draft Plan Overview and Environmental Impact Report

July 12, 2000 **Chapter 1: Introduction**

Chapter 2: Local Air Quality

No action items related to Chapter 1 and 2 of the 2001 Plan were recommended by the CAC at this meeting.

October 11, 2000 **Discussion of Future Year Activity Indicators**

The APCD presented activity data used in emission forecasting to the CAC so that the activity factors could be discussed and refined prior to the development of Chapter 6 (Emission Forecasting). The CAC provided the following comments and suggestions that led to several improvements of the activity indicators:

- Include ships calling on Port Hueneme into the number of vessels transiting the Santa Barbara Channel.
- Contact the Department of Oil and Gas (DOG) to determine whether they may be able to predict how many oil and gas wells will be abandoned in future years.
- Remove high production years (1980 to 1985) for oil and gas wells to give a more realistic prediction curve.
- Review DOG reports to obtain offshore oil and gas production data to determine an OCS growth factor.

February 21, 2001

Chapter 3: Emission Inventory

Chapter 4: Emission Control Measures

The CAC had the following comments requiring revisions to Chapter 3 and Chapter 4.

Chapter 3:

- Do not present categories in the tables of Chapter 3 if there are no emissions for that source category.

Chapter 4:

- The CAC recommended that APCD staff investigate the feasibility of the proposed control measures listed in the 2001 Plan. The CAC suggested input from affected industry and cost-effectiveness data from the ARB.
- The CAC suggested that Chapter 4 and Appendix B be revised to reflect that the control of internal combustion engines in the less than 50 horsepower range be included as a further study measure.
- Modify Chapter 4 and Appendix B to clarify that the turbine rule is mainly for the Ellwood Generating Station and that platform turbines will not need to be modified because they are already controlled to BARCT or that it is not cost-effective to require additional controls.

March 14, 2001

Chapter 8: Implementation Support Activities

Chapter 10: State and Federal Clean Air Act Requirements

For Chapter 8, CAC comments resulted in the following item:

- Create a separate Chapter in the 2001 Plan for land use and smart-growth issues (Chapter 9). This will allow for a better understanding of the relationship between growth and air quality.

The CAC did not make recommendations for revisions to Chapter 10.

April 11, 2001

Chapter 6: Emission Forecasting

For Chapter 6, the CAC comments resulted in the following changes:

- Revise the OCS activity indicator to 1.0 based on data provided in the Minerals Management Service COOGER Study. Additionally, the CAC recommended that we include some language in the Plan on what the OCS production activity indicator is intended to be used for and that it is not to be used to limit future offshore oil production.
- Adopted a resolution to make a recommendation to the Board that the APCD get

congressional aid to apply pressure to EPA rule makers for controlling OCS shipping emissions.

June 13, 2001

Chapter 4 Revisions

Chapter 7: Redesignation Request and Maintenance Plan

The discussion on Chapter 4 revisions lead to the following change to the Plan:

- Revisions to Rule 333 and Rule 345 were changed from proposed measures to further study measures.

For Chapter 7, the CAC comments included the following:

- It should be made clear in the Plan that emissions allocated to “other mobile sources” are actually emissions from channel shipping. In addition, include in the graphics the percentage of total NO_x and ROC emissions that are from channel shipping.

July 11, 2001

Executive Summary

Chapter 5: Transportation Control Measures

Chapter 9: Land Use Strategies

Chapter 11: State Mandated Triennial Progress Report and Triennial Plan Revision

Comments from this CAC at this meeting included the following:

- A suggestion was made to take federal credit for transportation control measures outlined in Chapter 5.
- A request to include an estimate of the air quality impact of not widening Route 101 from 4 to 6 lanes from Milpas Street to the Ventura County Line; to estimate vehicle emissions resulting from travel on Route 101; and, to estimate the vehicle emissions from long distance commuters (commuters who work in the South Coast but live outside the South Coast).

August 8, 2001 2001 Plan Overview

This meeting served as an opportunity for the CAC to comment on the completed draft 2001

Plan. The following comments are those from the August 8 meeting that have resulted in changes to the Plan:

- A request to include a discussion in Chapter 8 on the air quality benefits of emission reductions.
- A request to provide a list of the benefits to permitted sources for meeting attainment goals or being redesignated as attainment.
- Include a footnote for ERC table (on page 6-2) to show that ERC's for Vandenberg Air Force Base can only be used for on-base projects.

12.3 2001 PLAN PUBLIC WORKSHOPS

This section summarizes all public comments and staff responses from the public workshop. The public workshop was held on August 8, 2001 in Buellton. The CAC meeting on the evening of the same day also provided an additional opportunity for the public to provide oral comments on the 2001 Plan. Comments from the workshop and CAC meeting are provided below.

- *John Gilliland (URS)*: "Is there a suspense period for EPA to review the Plan?"

The completeness review period is 6 months. USEPA has up to 18 months to approve the Plan; however, the APCD has been working closely with EPA in order to expedite the review and approval process.

- *John Gilliland (URS)*: "There are eight new measures in the Plan. If there are no exceedances, will the rules still be promulgated for state purposes?"

Yes, since the federal contingency measures are also proposed measures for state attainment purposes.

- *John Gilliland (URS)*: "Will ERC's from control of IC engines be lost if a rule comes into place after the Plan is approved?"

Rule 806 applies to actual emission reductions that are surplus. If the APCD implements a rule that requires controls on equipment that were controlled to create ERCs, the emission reductions are no longer surplus and the ERCs will be discounted at the time of their use. If the control technique employed for ERCs overcontrols emissions (e.g., has a higher control efficiency than the efficiency required by the rule), then Rule 806 would consider the emission reductions that go beyond the rule

requirements as surplus emissions available for emission reduction credits.

- *Linda Fargo (Lockheed-Martin)*: “What is the current status of new federal standard for ozone and particulate matter (PM2.5)? Additionally, what is the relationship of the new standards to the maintenance plan? It should be pointed out in the conclusions of Chapter 2 that the new standards are not applicable to the maintenance plan.”

APCD staff will amend the text in Chapter 2 to make it clear that the new standards are not applicable to maintaining the one-hour ozone standard.

- *John Gilliland (URS)*: Regarding Regulation VIII: “Do we have to be in attainment of only the federal standard before we implement PSD?”

No, Santa Barbara County must be in attainment of both the federal and state ozone standards before PSD regulations take effect.

Is this pointed out in state Health and Safety Code? No. Regulation VIII of the APCD Rules and Regulations defines NSR and PSD.

Has EPA approved Regulation VIII? No

- *John Gilliland (URS)*: “What would happen if we bring backup generators that are currently exempt from permit into the inventory and go beyond 1999 base year inventory totals in future years (i.e., exceed carrying capacity in future years)?”

We do not think the inventory of backup generators that are currently exempt from permit is large enough to make emissions in our future years greater than base year (1999) emissions. Additionally, if backup generators were subject to permit, they would be subject to controls that would make them cleaner than they currently are, further decreasing the chance that their emissions would cause future emission estimates to exceed base year emissions.

- *John Gilliland (URS)*: “Is there any way EPA could grant interim approval of the Plan after completeness has been determined. There is concern that there could be violations of the ozone standard prior to approval of the Plan by EPA.”

The APCD has contacted EPA whether interim approval could be done. EPA has responded that while interim approvals have been granted under Title V, there is not a mechanism to provide for an interim approval of a maintenance plan.

- *Mukasa Kezala (Celite)*: “How are changes made to the Plan after comments are received from EPA?”

The APCD has been sending individual chapters to EPA after taking the comments of the CAC into account. As such, we do not expect substantive changes to the Plan based on EPA comments to the final plan. If EPA has any major comments, then those comments will be brought to the attention of the public and Board of Directors at the Board Hearing scheduled for November 15, 2001.

- *Mukasa Kezlala (Celite)*: “How many tons of NO_x will be reduced if an extra lane along Highway 101 is added to relieve congestion?”

Research conducted by the Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) indicates that sharp accelerations, which cause a vehicle to operate in a fuel enrichment mode, contribute significantly to high emission levels for carbon monoxide (CO) and reactive organic gases (ROG). Oxides of nitrogen (NO_x) emissions under fuel enrichment conditions are less dramatic. Nonetheless, traffic-smoothing projects, which keep speeds constant will reduce CO and ROG tailpipe emissions, but might slightly increase NO_x emissions at free-flow freeway speeds (60-75 mph). The situations most conducive to sharp accelerations at high speeds include entering freeways from on-ramps, maneuvering within merging lanes, passing slower vehicles, and stop-start conditions on congested freeways.

To the extent that capacity enhancement projects smooth traffic flows, reducing speed variability and the incidence of sharp accelerations, they should reduce emissions. The effects are greater for projects that increase capacity on roads that experience heavy congestion for a large part of the day and serve large volumes of traffic. The extent to which these emissions savings will be lost due to increased travel demand and therefore emissions on the improved facility depends on the socio-economic characteristics of the area traversed by the facility and the changes in travel behavior caused by the improvement. Therefore, it is difficult to determine the ROC and NO_x emission reductions due to lane increases since there are many factors involved including normal growth and increased traffic from such growth.

SBCAG is currently working on a South Coast Route 101 Deficiency Plan that addresses alternatives to adding additional lanes. The South Coast Route 101 Deficiency Plan indicates that at this time, approximately 100,000 vehicle miles of travel occur in LOS E or F conditions (unstable flow < 30 mph) each day during the AM and PM peak hour. Mitigating these conditions by adding additional lanes on Route 101 is estimated to result in approximately .25 tons per day or 62 tons per year of ROC and NO_x combined. This calculation is somewhat “crude” as it does not consider the possible negative impact of induced travel growth as a result of widening, nor the inevitable worsening of congestion and greater emissions that will occur over time even if the freeway is not widened.

- *Will Schuyler (City of Lompoc)*: “Is it necessary to keep traffic moving to reduce emissions (add additional lanes)? In addition, he stated that the public is being misled to believe that adding new lanes will induce more traffic on our local highways.”

NO_x and ROG decrease as vehicles speeds increase but only to a point. As vehicle speeds increase beyond 50-55 mph, emissions begin to increase. However, traffic operating in these higher speed ranges will still emit lower emissions than vehicles operating at very low speeds under unstable conditions (stop and go traffic). Nonetheless, the commenter is correct in stating that there are a number of negative

perceptions regarding the short-term impact of new highway capacity on inducing “new” or additional travel. A common misperception is that the observed greater utilization of a newly expanded roadway is the direct result of people increasing the frequency of their daily trip making behavior simply due to the capacity increase. Studies show that well over 90% of “new” traffic is actually the result of shifts in traffic from other routes or time periods rather than new increases in highway travel. Long-term (10+ years) induced impacts appear to increase over time as people gradually modify their activity schedules to take advantage of the travel-time savings afforded by capacity improvements.

The Route 101 widening would not open up new areas to development or affect current development patterns. The project would expand the total number of lanes from 4 to 6 in order to alleviate a bottleneck between two existing 6-lane sections. Currently, congestion occurs for short durations on the weekday peak periods (am < pm) with little or no congestion during the off-peak periods. Congestion is most acute during summer Sunday afternoon for which over 60% of the traffic is external in nature (visitors returning to LA, Ventura, etc.).

Primarily serving as a statewide connection between two urban areas, Route 101 accommodates many trips whose origin and destination lie outside of Santa Barbara County. Although travel speeds will increase, a significant daily induced effect is questionable given that travel times will only improve during the AM and PM peak periods, access to new land uses will not occur, and no viable alternative routes presently exist along this corridor from which traffic can be diverted onto Route 101.

Possible long-term induced effects of increased highway capacity are: increased car ownership; choice of residence; choice of work location; and choice of business location. Of these potential behavioral responses to new highway capacity, choice of residence, namely the choice to live in Ventura County or northern Santa Barbara County is the most applicable to any Route 101 improvements within the South Coast. Although choice of residence decisions are influenced to a far greater degree by the disparity of jobs relative to affordable housing in the South Coast (Carpinteria, Santa Barbara, Goleta) and the economic conditions that govern discretionary trip making behavior (e.g., recreation and shopping), this long-term behavioral response to improved accessibility should be recognized as a potential source of induced travel. (see also response to previous comment)

- *John Gilliland (URS)*: “Have there been any substantive comments by EPA on the chapters of the Plan that have already been forwarded to them?”

No. In addition, APCD staff will be meeting with EPA to discuss the draft Plan in order to expeditiously correct any deficiencies so that the review process by EPA can be expedited.

- *John Gilliland (URS)*: “Is it possible that the boiler rule (Rule 361) will be a point-of-sale rule rather than a retrofit rule? Is this stated anywhere in the Plan.”

It is possible that 361 will be a point-of-sale rule, which will be looked at during the rulemaking process. This is stated in Appendix B on page B-118.

- *Kevin Wright (Entrix):* “When is Rule 361 supposed to happen? Why is a decision not being made now regarding whether this is a retrofit or point-of-sale rule? There should be thorough study done on this rule to determine whether it is truly cost-effective.”

This is a long-term rule that is supposed to take effect 2007 to 2009. Because this is a long-term measure, it would not be prudent to make a decision on point-of-sale versus retrofit at this time. We agree that a cost-effectiveness study should be done prior to the promulgation of the rule.

- *Kevin Wright (Entrix):* “Has the APCD decided whether they will pursue an exemption for industrial maintenance coatings (Rule 323) applied in the marine environment?”

APCD staff will research the appropriateness of including an industrial maintenance coating petition provision in the revised Rule 323 during the rulemaking process to allow the use of coatings having an ROC content of up to 340 grams per liter. Additionally, the APCD and ARB will be holding a workshop in the near future to discuss the rule and the possibility of including such an exemption.

- *Kevin Wright (Entrix):* “Why are ICE control measures (N-IC-1 and N-IC-3) not included in the list of measures presented in the list on page 4-4? It should be pointed out more clearly that N-IC-1 and N-IC-3 are further study measures.”

The list of measures that is presented on Page 4-4 is a suite of further study measures from the 1998 Clean Air Plan that were reviewed for the current Plan. For clarification, the APCD will amend the text to point out that N-IC-1 and N-IC-3 are identified as further study measures in the 2001 Plan.

- *Kevin Wright (Entrix):* “Most of the emission reduction credits (ERC’s) are held by Vandenberg Air Force Base (VAFB). Can the ERC’s for VAFB be used only for Department of Defense activities? Are VAFB ERC’s added to the future emission inventories the same way that other ERC’s are added to the inventory?”

VAFB ERC’s can only be used for on-base projects. The ERC’s that have been banked by VAFB are used to adjust future year emission inventory projections in the same way that ERC’s from other sources are used to adjust future inventories.

- *Kevin Wright (Entrix):* “Commented that he was glad to see that the effects of weather on air quality is discussed in Chapter 7 of the Plan.”

Comment noted. Chapter 2 of the Plan also discusses the effects of local weather patterns on ozone concentrations throughout Santa Barbara County.

- *Kevin Wright (Entrix)*: “Commented that the Smart Growth principle of preserving open space, agricultural land, natural beauty and environmentally sensitive areas has nothing to do with air quality improvement.”

We have modified the text to focus on open space including agricultural land. The type of open space to be preserved is a matter of local policy. We do believe, however, that the preservation of open space has air quality implications.

- *John Gilliland (URS)/Kevin Wright (Entrix)*: “Several surveys have gone out from the APCD requesting information regarding backup generators. If the proposed diesel IC engine Rule 202 exemption revision brings existing generators into permit requirements, will that exemption change be identified in the Plan as another control measure? This rule will require major controls, but it is not mentioned in the Plan.”

Since we have not done an analysis of the number unpermitted generators in our county, the APCD cannot speculate on what an exemption revision will do to our future emission inventories.

- *Kevin Wright (Entrix)*: “Will there be a less than 200 hours per year exemption for Rule 363?”

Yes. APCD staff anticipate that Rule 363 will be consistent with the provisions of Ventura County APCD Rule 74.23. Ventura County Rule 74.23 exempts all units that operate less than 200 hours per year. The 200 hours per year threshold, however, will include all engine operations (e.g., maintenance testing, readiness testing, and emergency use).

- *Kevin Wright (Entrix)*: “Once the approval of the Maintenance Plan is published in the Federal Register, the Title V threshold for sources in our county goes up from 50 tons per year to 100 tons per year. What happens if we are in attainment for the ozone standard but then have a violation of the standard?”

It is our opinion that one violation of the standard may have little effect on our impending redesignation to an attainment area. Multiple violations may, however, be problematic. There is discretion by the EPA administrator to look at potential future violations on a case-by-case basis, so the ramifications to Title V sources are uncertain at this time.

Comments Received from August 8th Community Advisory Council Meeting

- *John Gunderson (VAFB)*: “There is a list in Appendix B of proposed rules, which have been listed in the EIR for the Plan for their potential ramifications. Does that commit the APCD to implement these measures?”

Yes. The measures are proposed for the state plan and contingency for federal requirements.

- *John Gilliland (URS)*: “Why are the Rule 202 revisions for backup generators not included in the Plan?”

See response to the previous comment.

- *Kevin Wright (Entrix)*: “The Plan assumes that Rule 361 will be a point-of-sale rule for the purposes of determining future emission reductions. Now that the rule is in the Plan as a point-of-sale rule, does that prohibit credit for emission reductions if existing boilers are retrofit for control?”

The APCD has not decided whether Rule 361 will be a retrofit or point-of-sale type rule. On page B – 188 of the draft 2001 Clean Air Plan, the text indicates, “In lieu of adopting a rule similar to the South Coast AQMD, the APCD could adopt a point-of-sale type rule. The Santa Barbara County APCD plans to decide during the rulemaking process whether Rule 361 should be a point-of-sale or a retrofit type rule.”

Emission reduction credits must be surplus. As such, credits are discounted once the rule has been promulgated. Since Rule 361 is potentially a point-of-sale rule, however, any reductions due to retrofit controls will be allowed to be claimed and kept as ERCs until the basic equipment is replaced if the rule is indeed promulgated as a point-of-sale rule. Note that emission reductions are based conservatively on a point-of-sale assumption with a 1 percent per year implementation rate. Whether the final rule will require point-of-sale or retrofit control techniques will be determined during the rulemaking process.

- *John Deacon (Torch Energy)*: “Commented that his interpretation is that ERC’s can be used as long as they are surplus or until a rule is implemented. As such, ERC’s are considered temporary in the case of an upcoming rule so it is best if the ERC’s are used for temporary projects.”

The APCD concurs with this interpretation.

- *Marc Chytilo (Law Office of Marc Chytilo)*: “An exemption revision to Rule 333 was presented in the 1998 Plan. Are we not deficient for not implementing that measure?”

The revision to Rule 333 was listed as a contingency measure in the 1998 Plan. Since we attained our goal of meeting the standard in 1999, it was not necessary to implement

any of the contingency measures, including the revision to Rule 333.

- *John Deacon (Torch Energy)*: “The Rule 333 revision will disproportionately impact smaller operations that may not be able to afford to apply the necessary controls. What are the emission reductions associated with the rule revision and are they worth it? If lean burn controls can be used then it is not a problem. If not, then expensive retrofits will be required, which could put some of the small operations out of business. EPA may not be aware of these consequences.”

Based on 1999 data and using an 80 percent compliance efficiency, the emission reduction estimate from all engines is 8.4 and the estimate from the spark-ignited engines is 6.8 tons per year of NOx.

Table B.3.5-3 data shows there are 10 field gas-fired engines. The 1999 Annual Report for Phoenix Energy indicates removal of its 50 brake horsepower gas compressor. (The emission reduction estimate was 0.19 tons per year of NOx from that engine.) The calendar year 2000 data on the remaining 9 engines indicates that they had average heat input ratings less than 0.52 MMBtu/hr. Assuming the low operating mode for these engines continues, they will be eligible for a Rule 333 exemption and no field gas-fired engines would need to be subject to the control techniques.

- *John Gilliland (URS)*: “There is a significant increase in offshore NOx emissions due to Channel Shipping. What are our options with regard to Channel Shipping emissions if we fall out of attainment?”

It is the responsibility of the USEPA to develop and adopt air pollution regulations for large marine vessels. The APCD’s Board recently directed staff to urge USEPA to adopt stringent requirements. APCD staff, along with a Board representative, will be working with local congressional representatives to apply pressure in the federal rulemaking process for control on large marine vessel emissions.

- *John Gilliland (URS)*: “What is the possibility of putting controls on geogenic sources of pollution and claiming them as federal contingency measures?”

The APCD is working with UCSB and Venoco to look at possible methods of capturing seep gas and utilizing the gas for alternative energy projects. Any reductions from such projects would lower future year emissions and would provide for cleaner air throughout the county. The control measures identified in the 2001 Clean Air Plan are based on the “planning emission inventory” which does not include natural sources per USEPA guidance. Therefore, no rules or credit can be identified for controlling natural sources.

- *John Gunderson (VAFB)*: “If we fall out of attainment, do we start over as moderate or go into severe classification?”

If we fall out of attainment, the USEPA will likely consider the air quality situation for the county and decide what classification would be most appropriate. There does not

appear to be clear guidance in the Clean Air Act regarding this occurrence.

- *John Deacon (Torch Energy)*: “Why not expand the controls that are used for crew and supply boats to the large marine vessels in the OCS?”

Crew and supply boats are generally in the 500 horsepower range whereas the large marine vessels (container ships, tankers, passenger liners) can be as large as 100,000 horsepower. Size differences in the engines would likely require dissimilar control technologies. Additionally, the large marine vessels fall under the jurisdiction of the USEPA, so any new rules or regulations that apply to these vessels must be promulgated by USEPA.

- *John Deacon (Torch Energy)*: “Why do we go from tons per year in the annual emission inventory to tons per day in the planning emission inventory?”

The planning inventory is specific to the May through October ozone season. The purpose of a planning inventory is to characterize the daily emissions of a non-attainment pollutant or its precursors during air quality exceedance periods and to use it as a tool to assess what sources to target for emission reductions.

- *John Deacon (Torch Energy)*: “There is a lack of discussion on ERC’s in the emission inventory section (Chapter 3). Why not provide a discussion on the air quality benefits or emission reductions?”

The APCD will include some language on the benefits of emission reductions in Chapter 8 of the Plan.

- *Marc Chytilo (Law Offices of Marc Chytilo)*: “Why do speed bins not go past 60-65 miles per hour range?”

The speed classes specified in Appendix C (VMT by Speed Class Distributions) are average speeds for an entire trip and should not be construed to represent instantaneous vehicle operating conditions. Note that the Air Resources Board may increase the number of speed class ranges in future updates to on-road models.

- *Marc Chytilo (Law Offices of Marc Chytilo)*: “Does the APCD crosscheck all the emission estimates generated by the Air Resources Board’s OFFROAD model? Does the APCD simply put its trust in numbers provided by the ARB?”

The OFFROAD model provides emission estimates for several hundred emission source categories, including offroad recreational equipment, farm equipment, lawn mowers, leaf blowers, pavers, scrapers and many others. Because of the numerous categories for which the OFFROAD model provides emission estimates, it would not be possible to verify the accuracy for each category as related to Santa Barbara County. Additionally, since the emission sources that are evaluated by the OFFROAD model are non-permitted, the APCD must employ the same estimation techniques as used by the

ARB.

- *Marc Chytilo (Law Offices of Marc Chytilo):* “Question on Page 7-2 in EIR.”

The Environmentally Superior Alternative could potentially mitigate some of the significant impacts associated with the proposed project by approving compliance methods with the least cross-media impacts. However, the Environmentally Superior Alternative may not be feasible, given economic, social, legal and technological factors. Additionally the residual impacts of the proposed project after applying mitigation measures are insignificant.

- *Kevin Wright (Entrix):* “Perhaps the list of benefits for meeting attainment goals should be put in the conclusions of Chapter 7.”

We will include the attainment benefits in the Executive Summary. Since the executive summary is in question form, it will be presented under “What are the implications of being redesignated as attainment?”

- *Kevin Wright (Entrix):* “The ERC table on page 6-2 should be footnoted to show that the ERC’s for Vandenberg Air Force Base can only be used for on-base projects.”

We will include a footnote to the ERC table on page 6-2 so that it is clear that VAFB ERC’s can only be used for on-base projects.

- *Patrice Surmeier:* “The ERC’s listed on page 6-2 assume a 1:1 emission reduction/emission increase ratio. New Source Review rules require that offset ratios be at least 1.2:1. If the ERC’s that are shown in the table are added to future inventory estimates as potential growth, then shouldn’t they be reduced by a minimum of 20%?”

Emission reduction credits are considered potential growth for planning purposes and are therefore added to each of the future emission forecasts (2005, 2010 and 2015).

While there will be various ratios applied to the ERC’s depending on when and where they are used, we include the entire amount of all available ERC’s to be consistent with the amounts that are in the bank. Discounting the ERC’s could add confusion to the practice of accounting for the ERC’s in future year inventories.

12.4 WRITTEN COMMENTS AND RESPONSES ON THE 2001 PLAN

This section provides all written comments received on the 2001 Plan and accompanying APCD staff responses to these comments.



County of Santa Barbara Planning and Development

John Patton, Director

August 9, 2001

Mr. Tom Murphy, Project Manager
Santa Barbara County Air Pollution Control District
26 Castilian Drive, B-23
Goleta, CA 93117

RE: Draft 2001 Clean Air Plan

Dear Tom:

Thank you for the opportunity to review the draft 2001 Clean Air Plan. Please take the following two comments into consideration when finalizing the plan and supplemental Environmental Impact Report (SEIR).

First, I refer you to the second paragraph of page A- 16, Appendix A, where the text recommends a factor of no growth in plan's projections for future activity on the Outer Continental Shelf (OCS). Although projections of future growth have been published, the Advisory Council notes that any future oil and gas production on the OCS will be required to be permitted under the New Source Review/Prevention of Significant Deterioration process. Consequently, any potential increase in emissions must be offset to provide a net emission benefit from the new OCS production activity.

We accept this explanation, but remain uncertain about its applicability to the large number of projected decommissioning projects on the horizon. The Minerals Management Service's *California Offshore Oil and Gas Energy Resources* study, referred to in this paragraph, also projects several fields that will reach the end of their economic lives, meaning more efforts to decommission platforms. Please clarify if these decommissioning activities also fall under the New Source Review process and, if not, how they should be treated in the proposed plan.

Second, I refer you to the control measures proposed for the new rule 363 on page B-100 of Appendix B. Two of the measures potentially impact public health and safety, and the environment, due to risk of upset: selective catalytic reduction (SCR) and methanol. Regarding SCR, the SEIR explicitly states that the use of anhydrous ammonia as a reducing agent for SCR is prohibited. We agree with this prohibition and ask that you restate it in the proposed rule for purposes of clarity.

It was the APCD staff who first brought to the public's attention the public health and safety issues associated with the use, storage, and transportation of methanol. Although you do not

Energy Division

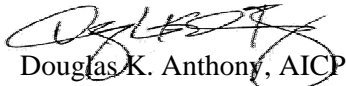
30 E. Figueroa Street, 2nd Floor - Santa Barbara CA 93101-2709
Phone: (805) 568-2040 Fax: (805) 568-2522

Mr. Tom Murphy
August 9, 2001
Page 2

anticipate the use of methanol as a SCR agent, please clarify that its use would require further study to ensure proper protection of public health and safety. Also please note the public health and safety issues of using methanol (e.g., its toxicity to humans, solubility in water, etc.) in the SEIR (Section 5-6). These clarifications would help to avoid implementing SCR with methanol as a control measure without fully understanding its adverse impacts, as was once done with anhydrous ammonia.

Please call me at extension 2046 if you have any questions.

Sincerely,


Douglas K. Anthony, AICP
Energy Specialist

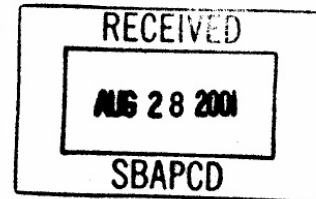


COLAB

The Coalition of Labor, Agriculture & Business

August 27, 2001

Tom Murphy
APCD CAP Project Manager
26 Castilian Drive, Suite B-23
Goleta, CA 93117



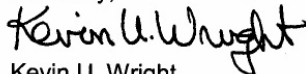
Subject: Comments on Draft 2001 Clean Air Plan

Dear Mr. Murphy:

The Coalition of Labor, Agriculture , and Business (COLAB) represents over 1,300 businesses and organizations in Santa Barbara County. Our Air Quality Task Force has reviewed the District's draft 2001 Clean Air Plan(CAP). Please find enclosed COLAB's Air Quality Task Force comments concerning the draft 2001 CAP.

Should you have any questions concerning the enclosed comments, please contact me at: (805) 477-5007.

Sincerely,



Kevin U. Wright
COLAB Air Quality Task Force Chairperson

Draft 2001 Clean Air Plan (CAP) Comments

1.) Chapter 4, Control Measures (page 4-4):

The District lists in Section 4.2 the 16 further study measures identified in the 1998 CAP. The text explains that these further study measures had been reclassified as proposed, deleted, or kept in the further study category. However, in Section 4.2 there is no mention of the internal combustion control measure (N-IC-3). Since this section lists mandated control measures, COLAB suggests that text be added to this section explaining that this control measure is being proposed pursuant to EPA comments and directives.

2.) Chapter 6, Emissions Forecasting, Section 6.2, Emission Forecast:

This section states that future year forecasted emission inventories must be adjusted to account for emission reduction credits (ERCs) that were banked prior to the base year inventory. The majority of the ERCs are owned by Vandenberg Air Force Base (VAFB), and can only be used for Department of Defense projects on VAFB. COLAB suggests that the amount of ERCs owned by VAFB be quantified and the text should further mention that these ERCs can only be used for VAFB projects.

3.) Chapter 9, Land Use Strategies:

This section of the CAP attempts to list "Smart Growth" principles, and then proposes certain land use strategies to achieve these principles. Most of the principles directly relate to improving air quality and there are sound strategies listed for achieving those principles. There is one exception. On page 9-2 of the chapter, the District lists bulleted "Smart Growth" principles. The fifth principle listed reads: "Preserving open space, agricultural land, natural beauty and environmentally sensitive areas." COLAB believes that this principle does nothing to enhance or improve the air quality of the county. In fact, the principle is not listed later in the chapter with any strategies to implement it. COLAB believes that this "Smart Growth" principle should be removed from the listing on page 9-2.

4.) Appendix B, Stationary Source Control Measure Working Papers:

Rule 361 (N-XC-4), Small Industrial and Commercial Boilers, Steam Generators, and Process Heaters (2 MMBtu/hr to < 5 MMBtu/hr)

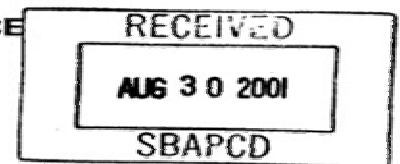
At the CAP public workshop held on August 8, 2001, District staff stated that the emission reductions included in the emissions forecast for this rule were for a "point of sale" rule only. In other words, these emission reduction measures would be imposed on newly installed commercial boilers, steam generators, and process heaters. However, the information contained in Appendix B for the proposed Rule 361 suggests that this is a retrofit rule. COLAB has several problems and questions with this approach:

- COLAB requests that this rule be listed as a point of sale rule and not a retrofit rule. The reason for this comment is that the District has not provided sufficient evidence and justification for a retrofit rule. The necessity for the rule, a complete emissions inventory, and a valid cost effectiveness determination have not been established.

- It is not clear as to how voluntary emission reductions would be handled as candidates for ERCs between now and rule implementation in the 2009 to 2011 time frame. Please confirm if voluntary emission reduction programs such as retrofitting boilers or process heaters will be eligible as candidates for the creation of ERCs.
- The District has not provided sufficient data to demonstrate that the proposed rule is cost effective. There is no analysis of the total costs for Low-NO_x burners, the anticipated permit fee costs, and the annual source testing costs. It is COLAB's opinion that a cost effectiveness determination in other Districts (Ventura County APCD and the SCAQMD) can not be used to determine cost effectiveness in Santa Barbara County.
- It is not clear as to how emissions estimates and emission reduction totals were derived. Please provide the detailed baseline emission inventory for which these emission forecasts were derived as a response to this comment. Why does the District primarily list units at oil and gas companies as combustion sources, which could be affected by Rule 361 (Reference Table B.3.8-1)? Certainly there are other sources, which will be affected by this rule. Are other sources included in the District's emission inventory?



DEPARTMENT OF THE AIR FORCE
30TH SPACE WING (AFSPC)



30 August 2001

MEMORANDUM FOR SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
ATTN: MR. DOUGLAS W. ALLARD

FROM: 30 CES/CEV
806 13th Street, Suite 116
Vandenberg AFB, CA 93437

SUBJECT: 2001 Clean Air Plan Comments

1. Vandenberg Air Force Base (VAFB) has reviewed the Santa Barbara County Air Pollution Control District (APCD) Draft 2001 Clean Air Plan (CAP), which is the county's plan to maintain the federal 1-hour ozone standard. Presently designated as a "serious" ozone nonattainment area, Santa Barbara County may be re-designated as a "maintenance" area once U.S. EPA approves the 2001 CAP. This will be a significant accomplishment for the county's air quality. However, missing from this draft is a growth allowance for future VAFB missions that have been part of previous CAPs.

2. The strategic location on the "knee" of California's coast gives VAFB national security importance and provides future missions with an operational flexibility that cannot be easily achieved elsewhere. Understandably, VAFB is presently under strong consideration for future Department of Defense (DOD) actions. Furthermore, the Bush administration is proposing a Base Realignment and Closure (BRAC) review of DOD installations. In past BRAC decisions, essential missions from closing bases were moved or realigned to other bases. Weighted heavily in the DOD decision matrix is the gaining installation's ability to comply with the General Conformity provisions of the 1990 Clean Air Act Amendments (CAAA). "A (federal) action is in conformance if its emissions are specifically identified and accounted for in the state implementation plan (SIP)."¹ Therefore, VAFB must prepare for such an action by including in the 2001 CAP the emissions necessary to accept a future mission and comply with the CAAA.

3. In 1994, VAFB worked closely with the APCD and its governing Board to procure a conformity growth allowance. The Board resolved that a small portion of the 1994 CAP safety margin would be allocated to VAFB as a growth allowance; this positioned the Air Force to make a positive conformity determination for future activities. Specifically, the ozone precursor allowance amounted to 75 tons per year of reactive organic gasses (ROG) and 225 tons per year of oxides of nitrogen (NO_x) and was earmarked for a new DOD mission or BRAC realignment such as an aircraft squadron operating from VAFB's large runway.

¹ When approved by U.S. EPA, the CAP becomes part of the California SIP, which is then federally enforceable. Conformity provisions require emissions mitigation, which are in addition to New Source Review terms and conditions.

GUARDIANS OF THE HIGH FRONTIER

4. There is still a genuine possibility that VAFB will realize a new or realigned mission, thus triggering a conformity determination. As a prime location for the Airborne Laser program, VAFB could bed-down six Boeing 747 aircraft and associated support personnel and equipment in 2005. VAFB is also under serious consideration as the main operating base for the Space Operations Vehicle forecasted to begin in 2012. This program includes replacing present day expendable vertical lift vehicles operating from VAFB space launch complexes with six to ten technologically advanced aerospace vehicles. Recently, although not selected, VAFB was evaluated as home base for a Consolidated Search and Rescue mission requiring twelve C-130 aircraft and six helicopters. There are also other DOD opportunities being evaluated as future VAFB missions.

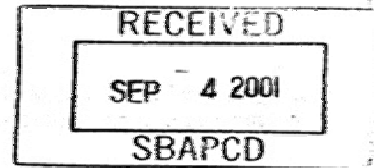
5. As a contingency for future VAFB missions, a continuation of the 1994 allowance of 75 tons ROG and 225 tons NO_x per year would provide an adequate margin for growth. This allowance would mitigate potential emissions from a future mission such as the Airborne Laser program. VAFB is requesting that the SBCAPCD include these emissions in the 2001 CAP over the ten-year period of 2005 through 2015.

6. VAFB needs again Santa Barbara County's assistance in procuring a conformity growth allowance by setting aside a portion of the 2001 CAP safety margin. The ability to support realigned missions is a major consideration when performing the basing analysis, which determines those installations that may be closed under the BRAC process. It is important that this window of opportunity is not lost so that VAFB continues to be viable and supports the local community well into the 21st century.

7. If you have any questions regarding this matter, please do not hesitate to call me at (805) 606-1921 or George Croll, my Air Quality Program Manager, at (805) 606-2044.



SCOTT W. WESTFALL, Lt Col, USAF
Commander, Environmental Flight



August 31, 2001

Mr. Doug Allard, Control Officer
Santa Barbara County Air Pollution Control District
26 Castilian Drive, Suite B-23
Santa Barbara, California 93117
Attn: Joe Petrini

By fax (961-8801), and US Mail

RE: Comments to the 2001 Clean Air Plan

Dear Doug:

Please accept the following comments to the draft 2001 Clean Air Plan on behalf of Committees for Land, Air, Water and Species.

References to pages correlate with the draft pagination.

Page EX-3 – health effects – Asthma, bronchitis and other respiratory disorders are worsened by moderate and even marginal ozone concentrations, not just “high” ozone concentrations. This was the basis for the 8-hour ozone standard, whose justifying studies concluded the absence of a health threshold. The text in the executive summary should not limit the concern to “high” ozone concentrations.

EX-6 – transport. As noted infra, the effect of transport should be more precisely quantified.

1-2 – last sentence of 1.1. upon a violation, contingency measures are to be implemented automatically with no further action by the District. This is a requirement of § 172, which does not allow the district to engage in discretionary evaluation staff before implementing the mandated contingency measures. It is not evidence that the § 175A standard is any different. The Plan’s unspecific reference to USEPA guidance (page 7-12) fails to advise a curious reader the basis for a different interpretation. All references to legal or controlling authority or guidance throughout the Plan should be specific.

The Plan fails to fully address § 175A contingency measure issues. The statute requires contingency provisions deemed necessary by the Administrator to “promptly correct” any violation. It does not appear a District “evaluation” is appropriate. Further, § 175A mandates specific treatment of previously designated measures, such as Rule 333, a federal contingency measure in the 1998 plan. Any weakening or this requirement would trigger a CEQA finding of significant impact.

1 -- 3 -- The District should note that EPA's July 17, 1998 policy on transport and extension of attainment dates are currently subject to judicial review in two federal circuit courts. The policy is not supported by the Act and is relied upon at the District’s peril. It is not clear why the District considers this policy

relevant to maintenance areas.

1 – 3 -- The Plan incorrectly overstates the effect of § 179(b)(1) Sanctions on federal transportation funding. Federal highway funds are not “lost”, and this mis-statement creates unproductive and inappropriate hysteria around conformity lapses and sanctions actions. The conformity regulations exempt many types of projects from lapse-caused funding restrictions (40 C.F.R. Part 93.126) and similarly the § 179 highway sanctions exempts a long list of air quality beneficial projects which would continue to qualify for federal transportation funds. See 58 Federal Register 51270, 51274, 10/1/1993. Transit, HOV lanes, highway safety projects and any “transportation-related programs as the Administrator, in consultation with the Secretary of Transportation, finds would improve air quality and would not encourage single occupancy vehicle capacity” are exempt from constraint. *Id.* The Plan should correctly explain this standard and properly educate the public of the beneficial air quality effect of highway sanctions and conformity lapse. Funds are not “lost”, merely redirected.

2 -- 5 -- the Plan refers to the addition of a third sampling station to be installed "around the end of year 2000". The Plan should be revised to reflect current conditions in the year 2001.

The District should enable its web site to display real-time monitoring results from all District stations.

2 -- 8 -- the Plan's reference to the D.C. Circuit decision in *American Trucking Association vs. Whitman* is not correct. The Supreme Court issued its decision in this case on Feb. 27, 2001. The Plan should be updated to reflect the Supreme Court's action in this matter, which is radically different from the bizarre and irrational appellate court decision. The revised standards were upheld.

2 -- 11 -- the Plan's reference to transport should be expanded to include an analysis of this scale of transport influences between Santa Barbara, Ventura, and the Los Angeles-basin. Federal law requirements ("a plan which provides for implementation, maintenance, and enforcement of such primary standard in each air quality control region [. . .] within such state." § 110 (a)(1)) and the California Clean Air Act (Health And Safety Code Section 39610) each require that transport be specifically considered and accommodated in the state implementation plan and each attainment and maintenance demonstration.

2 -- 13 -- the Plan should recognize that the District has not yet developed the particulate matter control strategy or plan.

2 -- 13 -- the Plan incorrectly recites a challenge to the federal particulate matter standard and again references a lower court ruling in matter. The Supreme Court has ruled, and plan must be updated.

2 -- 14 -- the Plan again references the future installation of a particulate matter monitor in the year 2000. The Plan should be commended to correct current conditions.

2 -- 24 -- the Plan should include a figure, which characterizes each air quality monitoring station by elevation.

3 – 9 -- Staff has advised Community Advisory Committee that it intends to utilize EMFAC 2001 in the final version of the Plan. The draft version of the Plan utilized EMFAC 2000. Depending upon the significance of the changes, the Plan may need to be recirculated. The next version of the Plan should

carefully identify all differences between the emissions inventories calculated under EMFAC 2000 versus those calculated under EMFAC 2001.

3 -- 11 -- commenters question whether the District's utilization of the standardized, statewide activity factors for off-road equipment, in particular construction and agricultural equipment, are correct. The District should compare CARB's generic construction equipment activity levels that are identified in project specific EIRs throughout the county and each of its cities to the SIP emissions inventory. The emissions associated with unpermitted activity such as highway maintenance, railroad maintenance, public works department activities, rental equipment, federal agency activities, routine maintenance, and other emissions activity utilizing heavy-duty diesel equipment should also be calculated and added to all known permitted construction emissions and compared against the Air Resources Board's calculated and untested numbers. The commenters believe that the Air Resources Board's standardized numbers understate the emissions activity in Santa Barbara County.

3 – 13 -- natural sources. The commenters again raise questions as to the veracity of biogenic emissions calculations. These concerns have been stated in the last three plan updates. The Air Resources Board calculations are highly suspect and have not been updated in many years. While these numbers have limited significance to the plan inventory and overall operation of the SIP, they are nevertheless significant from a public awareness perspective as natural sources appear to dwarf the planning inventory, creating arguments that planning efforts are statistically irrelevant when compared to natural sources. History has shown that air pollution control efforts of anthropogenic sources have been effective and improving ambient air quality, supporting the contention the natural sources have been overstated.

4 -- 6 -- CARB control measures. The Plan notes that CARB has identified and adopted a number of additional measures to further reduce emissions since the 1994 SIP. All CARB control measures must be made federally enforceable. The inclusion of these control measures in the Santa Barbara 2001 Clean Air Plan reflects a commitment on the part of both the District and the state to ensure that all stated measures are federally enforceable by inclusion in California's overall SIP.

4 -- 18 -- Pesticides. Given the level of agricultural activity in Santa Barbara County, and the high level of predicted future emissions growth that has been attributed to this category of activity, the pesticide measure should be adopted as a contingency measure in the 2001 Clean Air Plan. If the District violates the federal one-hour ozone standard in the next 10 years at a time when agricultural activity is growing rapidly, the pesticide rule will be very important.

5 -- 1 -- Transportation Control Measures. The commenters decries the Plan's statement that locally implemented TCMs, considered cumulatively, accomplish emissions reductions of only tens or hundreds of a ton per day. Is this a criteria that the District asserts applies to stationary sources? Simply including this language disparages the significance of TCMs today and into the future and impugns the efforts of many to accomplish their effective implementation. The language should be stricken.

A recent study published by the Air Resources Board on parking cash out found that this voluntarily implemented TCMs was respected and reducing VMT by 12 percent per day among the participants. (Evaluating The Effects of Parking Cash Out: Eight Case Studies, Donald C. Shoup, UCLA, September, 1997, CARB). Given that Santa Barbara County commuters travel nearly 2 million miles per day, the implementation of the parking cash out program that applied to only 50 percent of the county's employers

and accomplished a 12 percent average VMT reduction could itself accomplish the countywide VMT reduction of 120,000 miles per day. Given the large number of long distance commuters, the effective cohesive commuter choice program could be substantially more effective and have a significant impact on County VMT and overall countywide mobile source emissions. While some elements of a commuter choice program have been adopted and implemented in Santa Barbara County, a cohesive and comprehensive program is still lacking.

Commenters have previously submitted a correspondence to the District and SBCAG requesting the consideration of additional TCMs. § 175A mandates that the Maintenance Plan contain additional measures sufficient to ensure maintenance. Congress' use of the term "ensure" continued maintenance imposes a higher standard of certainty of maintenance than § 110's standard that SIPs "provide for" attainment. The plan's control strategy lacks an adequate margin of safety and therefore fails to meet the legal "ensure" standard and is thereby defective.

The County is projected to experience considerable population growth and even higher VMT/trip growth in the next 10 years. Long-distance commuting already exacerbates the effect of the jobs-housing imbalance, and the County can expect substantial relative growth in mobile sources emissions as VMT rises. Transport adds the potential for additional air pollution affecting local air quality. Commenter believes that the District and SBCAG must more aggressively address additional TCMs and other strategies to control VMT growth and related traffic congestion and mobile sources emissions. While the efforts undertaken to date are commendable, the District and SBCAG should continue to expand and refine these programs to maximize their effect. The proof is in the pudding: even with the various programs referenced by Mr. Powers in his August 7, 2001 response to my March 11, 2001 letter, VMT is climbing rapidly and long-distance commuting is on the increase. Programs must be rigorously reviewed and refined to optimize their effectiveness, and the root cause, poor land use decisions, addressed directly. While the new Chapter 9 is a good start, it offers no mandatory or enforceable strategies. Thus, the District and SBCAG must also commence, as a TCM and/or part of the RTP (i.e., as an enforceable commitment) a program to educate land use decisionmakers on the need for and how to ensure that land use actions have the minimum adverse effect on air quality. The goal must be reduction in the rate of VMT growth, and if the bright people at the District and SBCAG could enter into productive collaboration with each land use planning jurisdiction in active in the County, this commenter believes that the scale of the problem could be reduced.

While a trip to the Traffic Solutions website brings links and information about parking cash out, this site and the breadth of services described in Mr. Powers' August 7, 2001 letter under commuter choice must be more effectively conveyed to the target audiences and the public at large. It is an impressive list, but many of these programs are relatively new and not well known or employed. While we appreciate the staff increase at Traffic Solutions, the public is impatient for these programs to hit their stride. As noted in Dr. Shoup's Parking Cash-out Study, VMT reductions of 12% among participating workplaces are not improbable. Clearly, the Traffic Solutions parking cash out program must be amended to include the California tax benefits, which add considerably to overall program effectiveness.

In addition, this commenter has previously given considerable further suggestions of other TCM strategies. The Plan should include a program for the delivery of smart growth resources to land use planning officials. Our sprawling land use patterns cost local government in increased and inefficient services, destroy open space, increase auto dependence, waste personal economic resources and degrade

quality of life. See, for example, Driven to Spend: How Sprawl and Lack of Transportation Choice Are Driving Up Family Transportation Costs, <http://www.transact.org/>. Land use planners in the County and cities lack a regional perspective and are largely ignorant of the environmental and social ramifications of ignoring air quality impacts and transportation alternatives in their review and planning processes. This is one essential ingredient of sprawl. The Plan must tackle this issue aggressively, or else decisions made in coming years will preclude an efficient future public transportation system and create continuing problems for our communities. Only your agencies are positioned to assemble and provide effective materials on “smart” land use planning for air quality and transportation perspectives and make strong recommendations for appropriate land use development patterns and design. While your agencies and the Plan may lack direct regulatory control, you can serve both as an important source of information, training and expertise to cities and the county.

Pedestrian Projects: The region lacks a comprehensive sidewalk system, and continues to design new development prioritizing vehicular, rather than pedestrian access. Areas within existing communities where existing and future land uses are conducive to pedestrian use should be subject to a master planning process to be designed and shaped to become more pedestrian-friendly over time as redevelopment and other improvements occur and as these communities and developments mature.

Recognize Induced Traffic and VMT: the District and SBCAG should require future project-level analysis (and analysis of all private projects which require transportation infrastructure improvements to accommodate traffic increases) to include additional modeling that incorporates the principle of latent (induced) demand in its design. The Plan should require recalibration of the travel model, using actual VMT from completed projects.

TEA Restrictions to Enhance Transit and Smart Growth: Some communities in California have considered restricting certain portions of TEA-21 funds to communities which adhere to certain land use and transit performance standards. For example, the following policies could have application in Santa Barbara County for inclusion as TCMs:

- 1) A RTP investment policy prioritizing transportation projects that are coupled with transit, bicycle and pedestrian oriented development along transit corridors and nodes, and conditioning capacity increasing highway projects on the adoption of growth management plans that embody provisions for open space preservation and subregional agreement on a growth budget that does not overload either transportation infrastructure or other forms of infrastructure.
- 2) Condition funding and approval of projects serving large new trip generating land uses on a major reduction in drive-alone access to those projects. Such reductions shall be based on providing parking for fewer than the number of spaces ordinarily required, parking charges, cashing out employer paid employee parking, developer subsidies for transit access to the project, and other similar transportation measures. The effectiveness of demand management shall be guaranteed by an enforceable agreement to meet performance standards for access that reduce by some figure (half?) the number of drive alone trips and mandate the addition of further transportation incentives to meet performance goals if they are not met.
- 3) Increased county-level transit ridership targets (necessitating increased investment in transit, increasing the cost effectiveness of transit investments, as well as encouraging land use jurisdictions to

incentivize transit-supportive land use decisions). The TCM should reference achieving and maintaining a minimum modal split for transit, pedestrian and bike travel at specific milestones, with If/Then consequences for each portion of the county at these points for not reaching the specified target.

- 4) Fund highway expansions only within cities or sub-regions of the county where 80 percent of employees in businesses with over 5 employees are offered parking cash-out or commuter choices, and where parking is unbundled from rental housing and business rental/lease agreements.
- 5) Allocate a certain percentage of discretionary funds exclusively to projects (both maintenance and capacity-expanding) in areas that meet specified smart growth criteria as is the practice in San Mateo (where transportation money is given to cities that approve dense housing near rail stations).

These policies build upon the use of TEA funds as incentives for smart growth principle utilization, as pioneered by Dr. John Holtzclaw, director of Sierra Club's Transportation Program. This approach has been determined to be legally appropriate upon scrutiny by the Air Resources Board. (K. Walsh, ARB General Counsel, to F. Chin, MTC, 10/26/1999).

5 – 8 -- As discussed by the Community Advisory Council, the contingency TCMs could and should be adopted instead as normal TCMs for which an enforceable commitment to implement is made. Unenforceable commitments have the potential to degrade and backsliding is not limited.

MVEB – the plan does not clearly delineate what budgets are the MVEBs for conformity determination purposes. Other Districts and CARB have played “fast and loose” in identifying a on-road mobile source emissions inventory as an emissions budget, only to subsequently assert these were not MVEBs for conformity purposes. Similarly, it should be stated clearly that MVEBs are established for both VOC and NO_x in 2005 and 2015.

The District and plan should also include MVEBs for the year 2010 to allow a more attuned conformity analysis. Planning inventories are identified, and on-road mobile source emissions inventories are specified. The numbers are identified, but not clearly noted as MVEB.

Chapter 7 - Maintenance Request

The District has failed to demonstrate that the emissions reductions relied upon in asserting maintenance status are adequate and are actually enforceable and permanent. Diesel emissions (among others) from portable electrical generating equipment are predicted to increase in the County and throughout the state, but are not quantified in the Plan. The Plan is inadequate for its failure to define and either control or accommodate these emissions in the maintenance demonstration.

Transport, including additional transport of NO_x from portable generators, is uncontrolled in the absence of meaningful transport mitigation. The entire SIP is defective under § 110(a)(1) in this regard, but Santa Barbara County fails to address and overcome the issue in this submittal as it is relevant to Santa Barbara County. Citing EPA's illegal and irrational transport/attainment date extension policy demonstrates bad faith and avoidance of the issue. The 7/98 policy does not purport to apply to Maintenance areas, and the Plan does not explain how this could be reconciled. The reference should be omitted. Regardless, transported air pollution can and quite probably will interfere with the County's maintenance status.

Until transport is quantified and controlled, the submittal is inadequate.

OCS marine shipping emissions, while quantified, the estimates are wild guesses and many of the most important controls are not enforceable. If a single category of sources could defeat maintenance, OCS shipping is quite likely that source. The Plan's treatment of this source does not quantify the relevant emissions with sufficient accuracy and provide adequate controls.

We appreciate the hard work undertaken by numerous persons to make this Plan a reality and address our important air quality issues.

Thank you.

Sincerely,



Marc Chytilo

APCD RESPONSE TO PUBLIC COMMENTS

• *Comments From the County of Santa Barbara*

1. Comment: Decommissioning of OCS Platforms

Response: Section 42301.13 of the California Health & Safety Code prohibits the requirement of offsets for any removal or demolition of a stationary source, including OCS platforms. Potential short-term emissions associated with platform decommissioning are not specifically addressed in the Plan.

2. Comment: Rule 363 – Prohibition of anhydrous ammonia and the potential use of methanol as a selective catalytic reduction agent

Response: We will restate in the control measure that the use of anhydrous ammonia is prohibited. We recognize the risks associated with the use of methanol, but are unaware that methanol has been used as an SCR agent. As stated in the proposed control measure, we do not anticipate the use of methanol fuel as a means of rule compliance because the technique has not been used in normal operations. Staff will revise the control method text to indicate that an analysis of compliance with the California Environmental Quality Act would be accomplished through an Authority to Construct permit process if a source proposed to use methanol fuel.

• *Comments From COLAB*

1. Comment: Listing of Control Measures

Response: The comment infers that Section 4.2 is supposed to list the mandated control measures. This is incorrect. Section 4.2 lists the federal and state requirements that mandate control measures. The list of measures on Page 4-4 of the Plan shows the 1998 Clean Air Plan further study control measures that staff reviewed for the 2001 Clean Air Plan. The N-IC-3 control measure was not a further study measure listed in

the 1998 plan. However, the APCD amended text in Table 4-1 concerning the contingency/proposed Rule 333 to include the wording “to address USEPA concerns.”

2. Comment: Chapter 6 Emission Forecasts – Vandenberg Emission Reduction Credits
Response: We will amend the text in Chapter 6 to point out that the ERC’s listed for Vandenberg can only be used for on-base projects.
3. Comment: Chapter 9 Land Use Strategies – Smart Growth Principles
Response: We have modified the text to focus on open space including agricultural land. The type of open space to be preserved is a matter of local policy. We do believe, however, that the preservation of open space has air quality implications.
4. Comment: Rule 361: Boilers, Steam Generators and Process Heaters – Retrofit or Point of Sale
Response: **Reference Comment 4, first paragraph.** The APCD has not decided whether Rule 361 will be a retrofit or point-of-sale type rule. On page B – 188 of the draft 2001 Clean Air Plan, the text indicates, “In lieu of adopting a rule similar to the South Coast AQMD, the APCD could adopt a point-of-sale type rule. The Santa Barbara County APCD plans to decide during the rulemaking process whether Rule 361 should be a point-of-sale or a retrofit type rule.” Staff based the emission reductions for this control measure on a conservative estimate using a 1 percent implementation factor for each year of a point-of-sale type rule.
- Reference Comment 4, first bullet.** The APCD needs to study the Rule 361 implementation options. Implementing Rule 361 as a point-of-sale rule may be easier for sources but it poses new challenges for the APCD. As mentioned on page B – 118 of the draft 2001 CAP, no other air agency has a point-of-sale type rule for this equipment category and the SBCAPCD would need to oversee a certification program.

The APCD believes that the 2001 CAP contains sufficient evidence and justification for a retrofit type control measure for small industrial and commercial boilers, steam

generators, and process heaters in the 2 million to less than 5 million British thermal units range. Chapter 4.1 indicates, in part, “The California Clean Air Act requires the APCD to adopt every feasible control measure (Health and Safety Code, Section 40914(b)). The text on page B – 113 of Appendix B indicates, in part, “The same control techniques in use for equipment 5 MMBtu per hour or greater subject to Rule 342 emission limits will work for units less than 5 MMBtu per hour. The South Coast AQMD and Ventura County APCD have required NO_x controls for combustion equipment in this class since the early nineties.” If a control technique is feasible in the South Coast AQMD and the Ventura County APCD areas, it is feasible in the Santa Barbara County. And the Santa Barbara County APCD’s adoption of a similar rule is consistent with the requirement to adopt every feasible control measure.

Regarding COLAB’s concerns on the CAP indicating the necessity for the rule, a complete emissions inventory, and a valid cost-effectiveness determination, these are tasks the APCD performs during the actual rulemaking effort. Neither Chapter 4 nor Appendix B is intended to fulfill the Health and Safety Code Section 40727.2 requirement for the APCD to prepare a written analysis. The APCD prepares written analysis in the form of Board Packages and/or Staff Reports during the rulemaking process. Chapter 4 and Appendix B contain proposed control measures that have been achieved in practice elsewhere in California and that comply with the requirement to adopt every feasible measure. If, for some unforeseen reason, the APCD cannot make the findings required by Health and Safety Code Section 40727 during the rulemaking process, the APCD will abandon the proposed rulemaking and seek a revision to the CAP to eliminate the measure.

Reference Comment 4, Second Bullet. Emission reduction credits cannot be issued once a rule is promulgated that specifies controls for an emissions device. Any credits that were taken prior to the adoption of a rule but have been applied to a project, however, will not be lost to that project. Rule 806 applies to actual emission reductions that are surplus. If the APCD implements a rule that requires controls on equipment that were subject to ERCs, the emission reductions are no longer surplus

and the ERCs are no longer available. If the control technique employed for ERCs overcontrols emissions (e.g., has a higher control efficiency than the efficiency required by the rule), then Rule 806 would consider the emission reductions that go beyond the rule requirements as surplus emissions available for emission reduction credits.

Reference Comment 4, Third Bullet. Staff believes that the control method cost-effectiveness data from South Coast AQMD and Ventura County APCD are comparable to the cost-effectiveness data for Santa Barbara County. The actual rulemaking support document will include capital cost analysis and the anticipated permit fees. COLAB indicated a concern about the cost-effectiveness analysis not including annual source testing costs. As proposed in the draft 2001 Plan (page B – 116), there are no annual source testing costs, only an initial source test for high operating capacity units.

Reference Comment 4, Fourth Bullet. Staff used the calendar year 1999 point and area source inventory information for the baselines. These baselines are shown in Table 12-3 and Table 12-4. The APCD employs complicated algorithms that apply factors (e.g., growth, control measure efficiency, and area source speciations) to the baselines to obtain the 2005, 2010, and 2015 emissions and emission estimates. Table B-6 shows the control measure efficiency factors for each of these years.

Regarding the questions on Table B.3.8-1 and other sources that the rule may impact, the equipment listed in Table B.3.8-1 represents only point sources that the APCD has in its inventory. Rule 361 will also apply to equipment that is currently in the area source inventory. Staff estimates that the area source inventory has 265 units that will be subject to the rule.

- ***Comments From Vandenberg Air Force Base***

1. *Comment:* Vandenberg Air Force Base Conformity Growth Allowance
Response: Section 6.2.3 of Chapter 6 documents the growth allowance and ERC's to be provided by Vandenberg Air Force Base, that combine to create a Conformity Growth Allowance for the anticipated Airborne Laser (ABL) project.

- ***Comments From Marc Chytilo***

1. *Comment:* Health affects occur at marginal and moderate ozone levels
Response: The text has been changed from "high" to "elevated."
2. *Comment:* Transport should be more precisely quantified
Response: We are unable to quantify the impacts of transport with currently available data. Modeling conducted for the Southern California Ozone Study (SCOS) may help us quantify the impacts.
3. *Comment:* Contingency Measures
Response: We believe that identifying federal contingency measures from those that are proposed for state purposes complies with the spirit of the contingency requirements since these measures will be implemented according to the schedule outlined in the Plan. Since control measures can improve over time, we believe that evaluating our options at the time of a violation would allow us to more efficiently identify the most effective measures to implement.
4. *Comment:* EPA's Transport Policy
Response: The applicability and use of the transport policy will be evaluated if a violation of the federal 1-hour standard occurs and is clearly due to transport beyond our local control.

5. Comment: Implications of Highway Sanctions or a Conformity Lapse
- Response: Conformity lapses or Clean Air Act sanctions that remain in effect for some time can and will result in the loss of federal highway funds to those areas subject to such provisions. Sanctions and conformity lapses dramatically increase the chance that programmed projects will fail the timely use of fund restrictions. The latter will result in federal and state highway funds being redirected back to the state for reprogramming elsewhere statewide. Clean Air Act highway sanctions and the federal conformity regulations exempt only certain types of projects from these provisions (e.g., transit vehicle rehabilitation, transit operations, rideshare programs, bicycle/pedestrian facilities, HOV lanes, and safety improvements). Projects that are not “protected” by the exemptions include transit capital projects (i.e., purchase of new buses), the construction of new roads; road widening; intersection channelization (e.g., adding turn lanes); and, intersection signalization. All these non-exempt projects have the potential to reduce emissions by alleviating congestion and unstable traffic flow. Therefore, staff disagrees with the assertion that sanctions or conformity lapses always will result in air quality improvement.
6. Comment: Reference to the addition of a third PM2.5 sampling station around the year 2000.
- Response: The Plan will be updated to reflect current conditions with respect to PM2.5 monitoring. Note that it is now estimated by the ARB that the San Rafael Wilderness PM2.5 monitoring site will be in operation around the year 2002.
7. Comment: The District should enable its web site to display real-time monitoring results from all stations
- Response: The public can view hourly ozone concentrations from our monitoring stations by accessing our Web site. There are no plans to provide real-time ozone concentrations at this time.
8. Comment: Update to Supreme Courts Ruling on Ozone and Particulate Standards
- Response: The Supreme Courts February 27, 2001 decision will be reflected in Chapter 2 of the Plan.

9. Comment: Transport Analyses
Response: See previous responses on this topic.
10. Comment:Particulate Matter Control Strategy or Plan
Response: It is stated in the Plan that additional steps will need to be taken in order to attain the state PM₁₀ standard.
11. Comment:Challenge to Federal Particulate Matter Standard
Response: See response to Comment 3.
12. Comment:Update Particulate Monitoring Schedule
Response: See response to comment 6.
13. Comment:Include Air Monitoring Site Elevations
Response: The elevations of the monitoring sites are published in our annual air quality reports.
14. Comment: EMFAC Modeling
Response: Emission estimates between EMFAC2000 and EMFAC2001 emission estimates are small. EMFAC2001 generates a net difference of +0.93 t/d, +1.57 t/d, and - 0.30 t/d of ROC and NO_x combined for the 1999, 2005, and 2015 emission forecasts respectively. These differences do not alter the 2001 Maintenance Plan's findings, control strategy, or conclusions. Hence, re-circulation of the plan does not appear to be warranted. Changes in emissions due to EMFAC2001 will be identified in the revisions to the Draft 2001 Clean Air Plan.
15. Comment:Utilization of ARB OFFROAD Emission Estimates
Response: The OFFROAD model provides emission estimates for several hundred emission source categories, including offroad recreational equipment, farm equipment, construction and maintenance equipment and many others. Because of the

numerous categories for which the OFFROAD model provides emission estimates, it would not be possible to verify the accuracy for each category as related to Santa Barbara County. Additionally, since the emission sources that are evaluated by the OFFROAD model are non-permitted, the APCD must employ the estimation techniques as used by the ARB.

16. Comment:Biogenic Emissions

Response: The biogenics inventory was developed using a biogenic emission inventory system (BEIS) with county specific data. These were the best available tools at the time the biogenics inventory was prepared. The Air Resources Board has developed a new biogenics model, BEIGIS, but has yet to provide the APCD biogenic emission estimates from this model. It is anticipated that the 2000 emission inventory will include updated biogenic emission estimates based on the BEIGIS model.

17. Comment:Federal Enforceability of ARB Control Measures

Response: Comment Noted

18. Comment:Contingency Measure for Pesticides

Response: We agree that pesticide emissions in Santa Barbara County are important. In the 1994 SIP, the ARB committed to work with the State Department of Pesticide Regulation to reduce ROC emissions from commercial and agricultural pesticide use. Because the program was designed in 1994 specifically for areas designated as serious ozone non-attainment, Santa Barbara has not taken credit for any emission reductions from this measure. Any emission reductions that do occur within Santa Barbara County, however, will benefit air quality in the area.

19. Comment: Local Transportation Control Measure Effectiveness

Response: This statement should not be construed as a criteria nor an attempt to disparage the continued implementation of local TCMs. It does, however, accurately represent the emission reduction impact of traditional locally implemented TCMs relative to

other federal and statewide emission control measures. For instance, all the TCMs identified in the 1994 Clean Air Plan and 1998 Clean Air Plan combined (50 TCM projects and programs) resulted in an estimated .14 tons per day of ROC between 1990 and 1999. Compared to the total ROC reduction of 12.43 tons per day this represents a emission reduction contribution of 1.1 percent from TCMs. This is consistent with the 1 to 5 percent emission reduction benefit reported in other Clean Air Plans submitted in other areas of California and the United States. Congestion pricing, which is a non-traditional TCM has been shown to be more successful but lacks political support in most areas of the country.

20. Comment:

Parking Cash Out Programs

Response:

State law (SB 437) prohibits regional agencies in California from mandating employers to implement such programs on a countywide or regional scale through the passage of formal ordinances. Unless required as a condition of approval under CEQA, an employer cannot be required to offer parking cash out subsidies to its employees. Given the voluntary nature of such programs, parking cash-out and alternative commute options have been, and continues to be, aggressively marketed by SBCAG's Traffic Solutions Office. This includes informing employers of the recent changes in state and federal tax law that allow employers to offer employees parking and transportation benefits as tax-exempt compensation, with greater incentives. Copies of the tax code, samples and descriptions of the various potential parking cash-out strategies and their estimated tax savings are provided by Traffic Solutions in the Employer Transportation Coordinator (ETC) Training and Resource Guide. Similar information is posted on the Traffic Solutions Web Site. In addition, SBCAG staff regularly recommends parking cash out programs when reviewing/commenting on environmental documents for land use projects that trigger the Congestion Management Program thresholds for analysis.

21. Comment:

Additional Measures to "ensure" Attainment

Response:

We believe that the strategy outlined in the 2001 Clean Air Plan will ensure that we will provide for attainment of the federal 1-hour ozone standard through 2015.

This issue of adding TCMs to the Plan was raised as a motion at the July APCD Community Advisory Committee and was defeated. Nonetheless, the 2001 Maintenance Plan demonstrates that Santa Barbara County will stay below the attainment inventory out to 2015. Well over 80 percent of the Plan's emission reductions are from on-road mobile sources (13.72 t/d of ROG and 16.00 t/d of NOx). These emission reductions do not include the significant emission reductions anticipated from several funded projects and programs currently being implemented or are in the process of being implemented within Santa Barbara County. These projects are as follows:

- 1) South Coast Transit Priorities Project
 - Purchase 22 30' Electric Buses for Service Expansion
 - Purchase 17 30' Electric Replacement Buses
 - Purchase 2 22' Electric Shuttles for Service Expansion
 - Purchase 55 Enhanced Fare-boxes and Install 4 Super-Stops featuring shelters, street furniture, lighting, and electronic kiosks.
 - Nine New Transit Line or Line Modifications
- 2) Coastal Express Service: Ventura County – South Coast (VCTC & SBCAG)
- 3) CNG Conversion of 4 Clean Air Express Buses
- 4) Install CNG Fueling Station and Purchase 25 USCB Fleet Vehicles
- 5) Take a Vacation from Your Car Program
- 6) City of Santa Barbara Downtown TDM Program (Traffic Solutions)

More air quality benefiting projects will be funded during the next round of state and federal programming to be included as part of Santa Barbara County's 2002 Federal Transportation Improvement Program. All these projects will provide a real additional margin of safety for maintaining the federal 1-hour ozone standard. However, these emission reductions will simply not be credited on paper in the 2001 Maintenance Plan.

In addition, several TCM projects are included in the 2001 Plan as federal

contingency measures. Some of the TCM projects identified as contingency measures will likely proceed with implementation under state law and provide additional emission reductions towards maintaining the federal 1-hour ozone standard for ozone, but are not identified for federal credit. If the county experiences a violation of the federal 1-hour standard, the entire contingency package will be evaluated for possible implementation.

22. Comment:

Land Use Training/Education Program for Local Agency Planners

Response:

Both SBCAG and the APCD agree with the importance of educating both local planners and the public on the importance of “smart” land use development and design. Hence, an entire chapter of the 2001 Maintenance Plan addresses the land use and air quality linkage. Chapter 9 provides examples of specific land use strategies; provides a list of prospective transportation system management policies and programs that local agencies can incorporate into general plans and circulation elements; and, describes the process in terms of communication, coordination, and monitoring that may be necessary to ensure that such policies if pursued will produce the desired results. This chapter was purposely structured in this “how to” fashion to be a resource for local agencies.

SBCAG believes a prudent direction to take is to first monitor the experiences of other more serious nonattainment areas who are just now beginning to implement similar land use based TCM’s. Given the consequences of not meeting the federal conformity regulation expeditious implementation of TCM’s test, monitoring the political and institutional implementation constraints/barriers and gauging how amenable these measures are to emission reduction quantification, tracking, and reporting is a more appropriate course of action. In the mean time, some of these suggestions could be further evaluated from an RTP policy perspective. However, such RTP policies if pursued would not be federally enforceable.

23. Comment:

Need for Better TDM Marketing by Traffic Solutions

Response: As stated previously, parking cash-out and alternative commute options have been, and continues to be, aggressively marketed by SBCAG's Traffic Solutions Office. This includes informing employers of the recent changes in state and federal tax law that allow employers to offer employees parking and transportation benefits as tax-exempt compensation, with greater incentives. Copies of the tax code, samples and descriptions of the various potential parking cash-out strategies and their estimated tax savings are provided by Traffic Solutions in the Employer Transportation Coordinator (ETC) Training and Resource Guide. Similar information is posted on the Traffic Solutions Web Site. However, given that state law (SB 437) prohibits regional agencies in California from mandating employers to implement such programs on a countywide or regional scale through the passage of formal ordinances, implementation of parking cash out programs will remain voluntary and left to the discretion of the county's employers.

24. Comment: Land Use Training/Education Program for Local Agency Planners

Response: Both SBCAG and the APCD agree the importance of educating both local planners and the public on the importance of "smart" land use development and design. Hence, an entire chapter of the 2001 Maintenance Plan addresses the land use and air quality linkage. Chapter 9 provides examples of specific land use strategies; provides a list of prospective transportation system management policies and programs that local agencies can incorporate into general plans and circulation elements; and, describes the process in terms of communication, coordination, and monitoring that may be necessary to ensure that such policies if pursued will produce the desired results. This chapter was purposely structured in this "how to" fashion to be a resource for local agencies.

While SBCAG has very limited direct responsibility for land use planning in the region, there is increasing recognition of the need to effectively integrate land use and transportation planning in order to 1) reduce the impact of sprawl and consumption of land, 2) address the imbalance between jobs and housing in different parts of the region, 3) limit the increase in travel demand, and 4) minimize

the need for major highway capacity improvements.

SBCAG's Overall Work Program for fiscal year 2001-2002 includes several activities designed to help inform decision-makers and provide a framework for addressing these issues. These include upgrades to SBCAG's travel forecasting model to improve the land use/transportation linkage and a continuing project to analyze alternative land use futures in terms of their transportation implications. These activities will build upon the Regional Growth Forecast anticipated to be completed in 2001 and will provide input to the next update of the Regional Transportation Plan.

25. Comment:

Require Local Agencies to Develop Pedestrian Master Plans

Response:

SBCAG agrees that pedestrian-friendly facilities need to be given greater consideration in land use design and implementation. However, such considerations continue to be under the purview of the cities and the county. Chapter 9 of the 2001 Plan provides examples of specific land use strategies; provides a list of prospective transportation system management policies and programs that local agencies can incorporate into general plans and circulation elements; and, describes the process in terms of communication, coordination, and monitoring that may be necessary to ensure that such policies if pursued will produce the desired results. This chapter was purposely structured in this "how to" fashion to be a resource for local agencies.

The City of Santa Barbara is planning to develop a Pedestrian Facility Plan that will identify a comprehensive sidewalk system. This will be the first plan of its kind in Santa Barbara County.

A regional pedestrian issue that SBCAG is cognizant of and will continue to work with Caltrans on is cross-highway pedestrian and bikeway access issues. Given that Highway 101 can act as a barrier to pedestrian and bikeway cross-highway movements, increasing attention to this issue is needed during the design phase of

new interchanges and interchange reconstruction projects.

26. Comment: Recognize Induced Traffic and VMT

Response: SBCAG did include a discussion of induced VMT in the 1999 RTP EIR and has included a more in depth assessment using local traffic data in the Draft Route 101 Deficiency Plan (May, 2001). SBCAG does not advocate an “across the board” treatment of induced vehicle activity as a result of transportation infrastructure improvements. Current peer reviewed research and local data strongly suggests that the magnitude of an induced effect is scale sensitive (i.e., magnitude of travel time savings from the proposed improvement) and dependent on the presence of several other land use and travel demand characteristics and factors. Hence, consideration of latent demand should be handled on a project-by-project basis.

27. Comment: Require RTP Investment Policy Based on Agency Performance

Response: SBCAG staff feels that such restrictions if desired by the board would be more appropriate as RTP policies rather than formal TCM’s. Such policies do not easily lend themselves to emission reduction quantification or tracking which would be required if such policies were identified as TCMs .

It should be mentioned that the following two flexible funding programs (Federal Surface Transportation Program (STP) and Federal Congestion Mitigation and Air Quality (CMAQ)) are subject to similar restrictions within jurisdictions that are found to be in noncompliance with the adopted Congestion Management Program for Santa Barbara County (Section 65089.2 (C)(1) California Government Code).

28. Comment: Condition Roadway Funding on Agency TDM Programs

Response: See Response above.

29. Comment: Condition Roadway Funding on Transit Ridership Targets

Response: SBCAG currently monitors transportation performance measures including transit

ridership and model split percentages. However, SBCAG does not advocate including “targets” for these performance measures in the SIP as TCMs. Furthermore, the SBCAG board has yet to indicate its desire for performance based budgeting/programming – restricting state/federal transportation funds to those areas which meet certain quantifiable performance based measures.

Given the lack of flexibility in the federal conformity regulation, SBCAG is unwilling to jeopardize future transportation plans and programs by pursuing such non-traditional and relatively untested (in terms of long-term implementation) TCM measures. As such, SBCAG has been working with the APCD, ARB, and EPA for the better part of two years to incorporate TCM substitution provisions in our county’s Conformity SIP (within the interagency consultation procedures). TCM substitution would allow SBCAG and the APCD the ability to substitute/replace TCM’s in the SIP without jeopardizing the flow of federal transportation funds or compromising the emission reduction benefits credited in the SIP.

30. Comment:

Condition Roadway Funding on Agency Parking Programs

Response:

As stated previously, parking cash-out and alternative commute options have been, and continues to be, aggressively marketed by SBCAG’s Traffic Solutions Office. This includes informing employers of the recent changes in state and federal tax law that allow employers to offer employees parking and transportation benefits as tax-exempt compensation, with greater incentives. Copies of the tax code, samples and descriptions of the various potential parking cash-out strategies and their estimated tax savings are provided by Traffic Solutions in the Employer Transportation Coordinator (ETC) Training and Resource Guide. Similar information is posted on the Traffic Solutions Web Site. However, given that state law (SB 437) prohibits regional agencies in California from mandating employers to implement such programs on a countywide or regional scale through the passage of formal ordinances, implementation of parking cash out programs will remain voluntary and left to the discretion of the county’s employers. It would therefore

be inappropriate, if not illegal, to condition the flow of federal/state/local highway funds based on the number of employers who offer parking cash out programs to their employees.

31. Comment: Condition Roadway Funding on Agency Smart Growth Practices

Response: See Response above.

32. Comment: Condition Roadway Funding on Agency Smart Growth Practices

Response: See Response above.

33. Comment: Make Contingency Measure TCMs Formal TCMs in Plan

Response: The CAC discussed this topic at its July 11th meeting. Topics that generated the most discussion by the CAC included; 1) congestion on Route 101 as a major source of emissions in the county and the need to estimate these emissions - with and without a 6-lane widening project; 2) need for greater emission controls for heavy duty diesel engines; and, 3) the need to be more aggressive in packaging TCM's for inclusion in the 2001 Clean Air Plan control strategy. Discussion of the latter topic resulted in a proposed resolution recommending the APCD Board to take federal credit in the plan for all the projects listed as contingency measures (see Table 4). After a lengthy discussion that included SBCAG staff describing on-going clean air projects, proposed clean air projects, and SBCAG CMAQ programming history (see Attachment 2), the motion failed 6 to 10.

34. Comment: Plan Needs to Clearly Delineate Motor Vehicle Emission Budgets

Response: The 2001 Maintenance Plan clearly delineates what budgets are the motor vehicle emission budgets (MVEBs) for conformity determination purposes on pages 5-5 and 5-6 in Chapter 5 of the Plan and on page C-16 in Appendix C.

35. Comment: Plan Should Identify the 2010 Forecast as an Emission Budget

Response: Given the considerable resources needed to develop a planning emission inventory for a given forecast year, APCD/SBCAG staff must be very careful when selecting

emission forecast years that meet not only Clean Air Act mandates but also federal conformity regulation mandates. The federal conformity regulation requires emission budgets to be established relative to CAAA milestone years and stipulates that conformity analysis years be no greater than 10 years apart. The two forecast horizons that meet both these legislative requirements is 2005 and 2015. The on-road portions of these emission forecasts are based on SBCAG regional travel model output. For informational purposes and to allow a more attuned attainment emission inventory and emission trend comparison, a 2010 emission estimate was mathematically derived by interpolating (linear) the 2005 and 2015 travel model on-road activity estimates and thus should not be construed as an emission forecast. Hence, it would be inappropriate to establish an emission budget from an emission estimate based on “factored” vehicle activity data. This would constitute “backsliding” in terms of SBCAG’s conformity modeling protocol.

36. Comment: Enforceable and Permanent Emission Controls
Response: The majority of the emission reductions identified in the 2001 Clean Air Plan are from adopted statewide measures that are enforceable and permanent. The potential emission increases from diesel generators is too uncertain to quantify.

37. Comment: Transport Policy and Plan Adequacy
Response: We believe that this Plan addresses all federal Clean Air Act requirements and is approvable by EPA. See previous responses to the transport issue.

38. Comment: Marine Shipping Emissions
Response: We have quantified the emissions from Marine Shipping with the most currently available data and do not consider the estimates as “wild guesses.” This source of emissions is considered a “federal” source beyond local control. EPA was unable to provide a control factor for this source since the MARPOL Annex IV has not been ratified.

Table 12-1

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT BOARD <i>BOARD APPOINTED COMMUNITY ADVISORY COUNCIL (CAC) MEMBERS</i>		
BOARD MEMBER	TITLE	CAC APPOINTEE(S)
NAOMI SCHWARTZ	Supervisor, First District	Dan Eidelson & John Robinson
SUSAN ROSE	Supervisor, Second District	Larry Rennacker & Marc Chytilo
GAIL MARSHALL	Supervisor, Third District	Dave Pierce & Deborah Weeks
JONI GRAY	Supervisor, Fourth District	John Gunderson & Patrice Surmeier
TOM URBANSKE	Supervisor, Fifth District	John Deacon & Kevin Wright
RUSS HICKS	Councilmember, City of Buellton	John Gilliland & George Tise
RICHARD WEINBERG	Councilmember, City of Carpinteria	Tom Banigan & Doug Marsh
SAM ARCA	Mayor, City of Guadalupe	Bob Kober & Gustavo Acosta
DEWAYNE HOLMDAHL	Councilmember, City of Lompoc	Bea Kephart & Peter Schneekloth
GIL GARCIA	Councilmember, City of Santa Barbara	Lee Moldaver & Mark Martinez
LARRY LAVAGNINO	Councilmember, City of Santa Maria	Michael Johnson & Gary Winters
ED ANDRISEK	Councilmember, City of Solvang	Laura Kranzler & Richard Kasa

Table 12-2

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT CLEAN AIR PLAN PUBLIC PRESENTATIONS		
PRESENTATION	LOCATION	DATE
Public Workshops	Days Inn Windmill Banquet Hall Buellton	August 8, 2001 2:00 PM & 6:30 PM
APCD Monthly Board Meeting	Santa Barbara County Air Pollution Control District Board Board of Supervisors Hearing Room Santa Maria	September 20, 2001 2:00 PM
APCD Monthly Board Meeting	Santa Barbara County Air Pollution Control District Board Board of Supervisors Hearing Room Santa Barbara	October 18, 2001 2:00 PM
APCD Monthly Board Meeting	Santa Barbara County Air Pollution Control District Board Lompoc Council Chambers Lompoc	November 15, 2001 2:00 PM

Table 12-3

1999 POINT SOURCE INVENTORY BASELINE FOR RULE 361, SMALL INDUSTRIAL AND COMMERCIAL BOILERS, STEAM GENERATORS, AND PROCESS HEATERS (2 MMBtu/hr to < 5 MMBtu/hr)									
COMPANY DESCRIPTION	FACILITY DESCRIPTION	FACILITY No.	FACILITY DEVICE No.	DEVICE NAME	SIZE (MMBtu/hr)	SCC No.	FUEL USE (MMscf /yr)	NO _x (TPY)	NO _x (TPD)
ExxonMobil	POPCO	03170	0004	Sulfinol Teg Reboiler (E-251)	2.10	1-02-006-03	5.53	0.28	0.002110
Gato Corporation	Tognazzini Lease (Gato)	03200	0041	Heater Treater	3.50	3-10-004-05	4.19	0.21	0.000219
Gato Corporation	Tognazzini Lease (Gato)	03200	0039	Boiler	4.25	1-02-006-03	12.60	0.63	0.000192
Goleta Sanitary District	Goleta Sanitary District	01528	0001	Boiler #1	2.09	1-03-007-01	1.17	0.04	0.000110
Goleta Sanitary District	Goleta Sanitary District	01528	0002	Boiler #2	2.09	1-03-007-01	15.23	0.46	0.001260
Greka SMV, Inc.	Battles Lease, SMV Field	03497	0011	Heater Treater	3.00	3-10-004-04	6.38	0.30	0.010027
Greka SMV, Inc.	Union Sugar Lease	03083	0035	Heater Treater	4.00	3-10-004-04	20.30	1.16	0.007918
Greka SMV, Inc.	Jim Hopkins Lease	03092	0006	Heater Treater	4.00	1-02-006-03	0.86	0.04	0.002247
Greka SMV, Inc.	Bell Lease (Cat Canyon)	03211	0006	Boiler: H-117	4.00	1-02-006-03	6.47	0.35	0.010055
Greka SMV, Inc.	Bell Lease (Cat Canyon)	03211	0012	Boiler: H-118	4.00	1-02-006-03	6.47	0.35	0.010082
Greka SMV, Inc.	Bettiga Lease	03325	0009	Boiler	4.88	1-02-006-03	10.09	0.50	0.000192
Greka SMV, Inc.	Bettiga Lease	03325	0042	Boiler	4.95	1-02-006-03	0.39	0.02	0.000329
Richards Oil Co.	Peshine Lease/Tompkins	04129	0004	Boiler	4.25	3-10-004-15	11.92	0.64	0.000329
Santa Maria Refining Company	Dominion Lease	04127	0007	Heater Treater	2.00	3-10-004-04	7.85	0.43	0.000932
Santa Maria Refining Company	Santa Maria Refining Company	00037	0005	Asphalt Heater: (Ah-3)	3.50	3-05-002-06	71.83	3.66	0.000904
Santa Maria Refining Company	Santa Maria Refining Company	00037	0009	Boiler: (B-3)	4.00	1-02-006-03	56.65	2.89	0.000904
Santa Maria Refining Company	Santa Maria Refining Company	00037	0010	Boiler: (B-4)	4.00	1-02-006-03	16.02	0.82	0.002904
Santa Maria Refining Company	Santa Maria Refining Company	00037	0004	Asphalt Heater: (Ah-1)	4.50	3-05-002-06	72.01	3.67	0.002301
Santa Maria Refining Company	Santa Maria Refining Company	00037	0029	Asphalt Heater: (Ah-2)	4.50	3-05-002-06	72.22	3.68	0.001123
Sierra Resources	Soladino Fee Lease	03031	0006	Steam Boiler	4.50	3-10-004-15	16.33	0.84	0.001479
So Cal Gas	La Goleta	01734	0028	Heater: Hot Oil (Plant #14)	4.00	1-03-006-03	1.43	0.07	0.000849

1999 POINT SOURCE INVENTORY BASELINE FOR RULE 361, SMALL INDUSTRIAL AND COMMERCIAL BOILERS, STEAM GENERATORS, AND PROCESS HEATERS (2 MMBtu/hr to < 5 MMBtu/hr)									
COMPANY DESCRIPTION	FACILITY DESCRIPTION	FACILITY No.	FACILITY DEVICE No.	DEVICE NAME	SIZE (MMBtu/hr)	SCC No.	FUEL USE (MMscf /yr)	NOx (TPY)	NOx (TPD)
United States Penitentiary	Federal Correctional Inst. (Furn. Factory)	03965	0002	Fci Boiler #1	4.18	1-03-006-03	9.05	0.47	0.001342
United States Penitentiary	Federal Correctional Inst. (Furn. Factory)	03965	0003	Fci Boiler #2	4.18	1-03-006-03	9.76	0.51	0.003178
Venoco, Inc.	Ellwood Onshore Facility	00028	0008	Heater Treater (H-201)	4.40	1-02-006-03	1.12	0.08	0.000110
Venoco, Inc.	Ellwood Onshore Facility	00028	0009	Heater Treater (H-203)	4.40	1-02-006-03	0.98	0.07	0.000767
Venoco, Inc.	Carpinteria Gas Plant	00027	0003	Therminol Heater (C-81)	4.99	3-10-004-04	13.77	0.77	0.000575
Vintage Petroleum	Bradley Lands/Bradley Consolidated Lease	04103	0011	Heater Treater, O-7	2.00	3-10-004-04	1.81	0.09	0.001726
Vintage Petroleum	Chamberlin Lease	03000	0006	Tank Heater #2	2.51	3-10-004-05	2.31	0.12	0.000959
Vintage Petroleum	Chamberlin Lease	03000	0007	Tank Heater #3	2.51	3-10-004-05	2.31	0.12	0.000959
Vintage Petroleum	Davis Lease	03002	0012	Tank Heater #2	2.51	3-10-004-05	6.38	0.33	0.001370
Vintage Petroleum	Davis Lease	03002	0013	Tank Heater #3	2.51	3-10-004-05	6.38	0.33	0.000055
Vintage Petroleum	United California Lease	03040	0015	Heater Treater: UCAL2	3.00	3-10-004-05	8.19	0.41	0.000822
Vintage Petroleum	Los Flores Lease	04008	0005	Boiler/Tank Heater	3.75	1-02-006-03	1.55	0.08	0.001288
Vintage Petroleum	Los Flores Lease	04008	0010	Heater Treater	3.75	3-10-004-05	3.22	0.17	0.001397
Vintage Petroleum	United California Lease	03040	0029	Heater Treater / Desander	4.00	3-10-004-05	10.74	0.54	0.000219
Vintage Petroleum	United California Lease	03040	0030	Heater Treater / Desander	4.00	3-10-004-05	6.12	0.31	0.000466
Vintage Petroleum	Bradley Lands/Bradley Consolidated Lease	04103	0020	Heater Treater / Desander	4.00	3-10-004-04	6.74	0.34	0.000247
Vintage Petroleum	Bradley Lands/Bradley Consolidated Lease	04103	0021	Heater Treater / Desander	4.00	3-10-004-04	2.41	0.12	0.000932
Vintage Petroleum	Bradley Lands/Bradley Consolidated Lease	04103	0008	Boiler	4.25	1-02-006-03	2.62	0.13	0.000329
Vintage Petroleum	Bradley Lands/Bradley Consolidated Lease	04103	0009	Heater Treater	4.90	3-10-004-05	4.53	0.23	0.000356
Vintage Petroleum	Chamberlin Lease	03000	0022	Heater Treater	4.91	3-10-004-05	6.49	0.34	0.000630
Vintage Petroleum	Davis Lease	03002	0007	Heater Treater	4.91	3-10-004-05	20.13	1.06	0.001178
Vintage Petroleum	United California Lease	03040	0011	Boiler	4.94	1-02-006-03	9.66	0.49	0.001753
TOTALS							552.20	28.15	0.077124

Table 12-4

1999 AREA SOURCE INVENTORY BASELINE FOR RULE 361, SMALL INDUSTRIAL AND COMMERCIAL BOILERS, STEAM GENERATORS, AND PROCESS HEATERS (2 MMBtu/hr to < 5 MMBtu/hr) ¹				
AREA SOURCE CATEGORY	CES	FUEL USE (MMscf/yr)	NO _x (TPY)	NO _x (TPD)
Industrial Natural Gas Combustion - Unspecified	47142	158.6205	4.7316	0.016522
Commercial Distillate Oil Combustion	47159	812.9856	7.6583	0.020982
Commercial Natural Gas Combustion - Unspecified	47167	2068.9800	79.6557	0.218235
Commercial Residual Oil Combustion	47183	6.5750	0.1703	0.000467
Commercial L.P.G. Combustion	58727	3132.3300	9.2341	0.015296
Commercial Natural Gas Combustion - Water Heating	58743	476.8200	23.841	0.065318
Industrial L.P.G. Combustion	66795	509.4702	2.1194	0.005807
Industrial Distillate Oil Combustion	66803	272.6388	2.5683	0.007206
Industrial Residual Oil Combustion	83071	208.6671	5.4055	0.015166
TOTALS		7,647.09	135.3842	0.3650

¹ Not all the equipment within the CES numbers shown will be affected by Rule 361.



PUBLIC NOTICE
DRAFT 2001 CLEAN AIR PLAN and ENVIRONMENTAL IMPACT REPORT
PUBLIC COMMENT PERIOD STARTS AUGUST 1, 2001

SUMMARY: The Santa Barbara County Air Pollution Control District (APCD) has prepared a Draft 2001 Clean Air Plan and associated Environmental Impact Report. The Clean Air Plan is required by federal and state law to show how the county will reduce ozone air pollution to meet health standards. The 2001 Clean Air Plan will be submitted to the California Air Resources Board and, as part of the State Implementation Plan, to the U.S. Environmental Protection Agency. The Clean Air Plan addresses several specific mandates of the federal Clean Air Act Amendments, including the following:

CLEAN AIR PLAN COMPONENT

Implementation Plan Requirements
Redesignation Request
Maintenance Plan Requirements
Contingency Provisions
Updated 1999 Emission Inventory
Emission Budgets

FEDERAL CLEAN AIR ACT REFERENCE

§110(a)(2)
§107(d)(3)
§175A
§175A(d)
§182(a)(1)
§176(c)(2)

The 2001 Clean Air Plan also provides a three-year update to the 1991 Air Quality Attainment Plan, the 1994 Clean Air Plan, and the 1998 Clean Air Plan as required by the California Clean Air Act. The 2001 Clean Air Plan includes previously adopted air pollution control measures and newly proposed/contingency emission control measures. Emission budgets established in the 2001 Clean Air Plan for reactive organic compounds and oxides of nitrogen will be used to determine conformity of transportation plans and programs. During the public review period for the Draft 2001 Clean Air Plan, additional on-road emissions data and growth forecast data might become available. These data may be incorporated into the Final 2001 Clean Air Plan.

Pursuant to the **California Environmental Quality Act (CEQA)**, the APCD has prepared an Environmental Impact Report for the 2001 Clean Air Plan.

PUBLIC REVIEW: The Draft 2001 Clean Air Plan will be available for public review and comment for 30 days beginning August 1, 2001. The Environmental Impact Report will be available for review and comment for 45 days beginning on August 1, 2001. Both documents will be available at public libraries in Santa Maria, Buellton, Lompoc, Goleta, Santa Barbara, UCSB, at the following four locations and on the APCD website at www.sbcapcd.org:

Air Pollution Control District
26 Castilian Drive B-23
Goleta

County Clerk
123 E Anapamu
Santa Barbara

5th District Supervisors Office
511 E Lakeside Parkway
Santa Maria

County Clerk
401 E Cypress, Suite 101
Lompoc

PUBLIC WORKSHOP: A public workshop has been scheduled to present the Draft 2001 Clean Air Plan and Environmental Impact Report in order to receive public comments at the following time and location:

Wednesday, August 8, 2001 2:00 PM – 5:00 PM

Days Inn, Windmill Room, 114 East Highway 246, Buellton

There will also be a meeting of the APCD Community Advisory Council on Wednesday August 8, 2001 at 6:30 pm at the address above. Public comments can also be provided on the 2001 Clean Air Plan and the Environmental Impact Report at the Community Advisory Council meeting.

WRITTEN COMMENTS: Written comments on the Draft 2001 Clean Air Plan should be submitted to Tom Murphy, APCD CAP Project Manager, 26 Castilian Drive B-23, Goleta, CA 93117. In order to be addressed in the Final Clean Air Plan, comments must be received by 5:00 PM on August 31, 2001. Written comments on the Environmental Impact Report should be submitted to Ron Tan, APCD Community Assistance Section, 26 Castilian Drive B-23, Goleta, CA 93117, by 5:00 PM on September 17, 2001. For more information, please contact Mr. Murphy at 805/961-8857 or Dr. Tan at 805/961-8812.



NOTICE OF PUBLIC HEARING
2001 CLEAN AIR PLAN and SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
Thursday, November 15, 2001 – Approximately 2:00pm
Lompoc City Hall Council Chambers
100 Civic Center Plaza
Lompoc, California 93438

The Santa Barbara County Air Pollution Control District will hold a public hearing to consider adoption of the proposed 2001 Clean Air Plan and certification of the Supplemental Environmental Impact Report (SCH No. 9103045) for the 2001 Clean Air Plan.

SUMMARY: The Santa Barbara County Air Pollution Control District (APCD) has prepared a proposed 2001 Clean Air Plan. The Clean Air Plan is required by federal and state law to show how the county will reduce ozone air pollution to meet health standards. The 2001 Clean Air Plan will be submitted to the California Air Resources Board and, as part of the State Implementation Plan, to the U.S. Environmental Protection Agency. The Clean Air Plan addresses several specific mandates of the federal Clean Air Act Amendments, including the following:

<u>CLEAN AIR PLAN COMPONENT</u>	<u>FEDERAL CLEAN AIR ACT REFERENCE</u>
Implementation Plan Requirements	§110(a)(2)
Redesignation Request	§107(d)(3)
Maintenance Plan Requirements	§175A
Contingency Provisions	§175A(d)
Updated 1999 Emission Inventory	§182(a)(1)
Emission Budgets	§176(c)(2)

The 2001 Clean Air Plan also provides a three-year update to the 1991 Air Quality Attainment Plan, the 1994 Clean Air Plan, and the 1998 Clean Air Plan as required by the California Clean Air Act. The 2001 Clean Air Plan includes previously adopted air pollution control measures and newly proposed/contingency emission control measures. Emission budgets established in the 2001 Clean Air Plan for reactive organic compounds and oxides of nitrogen will be used to determine conformity of transportation plans and programs. During the public review period for the Draft 2001 Clean Air Plan, updated on-road emissions and growth forecast data were incorporated into the proposed 2001 Clean Air Plan. These updated data did not change the control strategy recommended in the Plan.

Pursuant to the **California Environmental Quality Act (CEQA)**, the APCD has prepared a Supplemental Environmental Impact Report (SCH No. 91031045) for the 2001 Clean Air Plan.

PUBLIC REVIEW: The 2001 Clean Air Plan and Supplemental Environmental Impact Report are available at public libraries in Santa Maria, Buellton, Lompoc, Goleta, Santa Barbara, UCSB, on the APCD website at www.sbcapcd.org and at the following four locations:

Air Pollution Control District 26 Castilian Drive Goleta	County Clerk 123 E Anapamu Santa Barbara	5 th District Supervisors Office 511 E Lakeside Parkway Santa Maria	County Clerk 401 E Cypress, Suite 101 Lompoc
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WRITTEN COMMENTS: Written comments on the 2001 Clean Air Plan should be submitted to Tom Murphy, APCD CAP Project Manager, 26 Castilian Drive, Goleta, CA 93117. In order to be included in the staff report, comments must be received by 5:00 PM on October 26, 2001. For more information, please contact Mr. Murphy at (805) 961-8857.

Published Sunday, October 14, 2001