

MEMORANDUM

TO: Ben Ellenberger, TEA Division Manager

FROM: Carly Barham, Air Quality Specialist

DATE: September 8, 2016

SUBJECT: Environmental Review for the 2016 Ozone Plan, including ***Addendum to the 2010 Clean Air Plan EIR***

1.0 BACKGROUND

The 2016 Ozone Plan (2016 Plan) is the eighth triennial update to the initial state Air Quality Attainment Plan adopted by the Santa Barbara County Air Pollution Control District (District) Board of Directors in 1991 (other updates were done in 1994, 1998, 2001, 2004, 2007, 2010, and 2013). Each of the Santa Barbara County plan updates have implemented an “all feasible measures” strategy to ensure continued progress towards attainment of the state ozone standards. Since 1992, Santa Barbara County has adopted or amended rules implementing more than 25 control measures aimed at reducing emissions at stationary sources. These measures have substantially reduced ozone precursor pollutants (nitrogen oxides, or NO_x, and reactive organic compounds, or ROCs). This strategy has successfully improved the County’s air quality so that we now meet the state 1-hour ozone standard. While we have yet to attain the state 8-hour ozone standard, we are getting closer. In order to be designated attainment, air quality measurements must show that both the 1-hour and the 8-hour standards are not violated.

2.0 REASON FOR THIS ***ADDENDUM TO THE 2010 CLEAN AIR PLAN EIR***

The District’s 2010 Clean Air Plan (2010 Plan) included control measure options for numerous District rules. These control measures generally focused on two types of control strategies: (1) reducing the allowable ROC content of cleaning solvents and other products, and (2) lowering the NO_x emission limits for combustion units. The District prepared a program Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) to analyze the potential environmental impacts of implementing the 2010 Plan (State Clearinghouse #2010071014), including implementation of all of the control measures proposed for adoption in the 2010 Plan. The project description in the 2010 Plan EIR, Chapter 2, includes a summary of the proposed control measures and how they might be implemented. The EIR analyzes the potential for environmental impacts in several different issue areas, including air quality, biological resources, hazards-risk of upset, hazardous materials, water resources, land use/planning, noise & nuisance, public service, transportation/circulation, utilities/energy, and global climate change/greenhouse gas emissions. As documented in the 2010 Clean Air Plan EIR, no significant environmental impacts were anticipated to occur as a result of implementation of the 2010 Plan.

The 2010 Clean Air Plan EIR was designed to act as a program EIR which, pursuant to CEQA Guidelines, may be prepared on a series of actions that can be characterized as one large project and are related "...in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program." [CEQA Guidelines Section 15168 (a)(3)]. The use of the program EIR with later activities must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared [CEQA Guidelines Section 15168 (c)].

There are differences between the 2010 Plan and the 2016 Ozone Plan, further described below. District staff compared these differences to assess whether they would result in significant new environmental impacts. None of the conditions described in State CEQA Guidelines Section 15162 or Section 15163, calling for the preparation of a subsequent EIR or supplement to an EIR, are anticipated to result from these differences. Therefore, pursuant to Section 15164 of the State CEQA Guidelines, and the explanation set forth below, the District prepared this Addendum to the 2010 Clean Air Plan EIR.

3.0 DIFFERENCES BETWEEN THE 2010 CLEAN AIR PLAN AND THE 2016 OZONE PLAN

The 2016 Ozone Plan is different from the 2010 Plan in that it is a more streamlined update and it does not include some extra information that was provided in the 2010 Plan. Specifically, the 2010 Plan included a separate chapter on Greenhouse Gases and Climate Change, and also a chapter on Transportation Policy, Air Quality, and Land Use. However, neither of these chapters in the 2010 Plan involved the implementation of control measures that might result in environmental impacts under CEQA.

STATIONARY SOURCE CONTROL MEASURES CARRIED OVER FROM 2010 CLEAN AIR PLAN

The 2010 Clean Air Plan proposed to implement twelve different control measures, to reduce emissions of both ROC and NO_x; those measures are summarized in Table 4-3 of the 2010 Plan and potential environmental impacts related to those control measures were analyzed in the 2010 Clean Air Plan EIR. Some of those measures have since been implemented through the District's rule development process, and the resulting rules have been adopted by the District Board. Control measures that have yet to be implemented are proposed for adoption in the 2016 Plan. These measures are summarized in Table 4-2 of the 2016 Plan, and are described in Chapter 4.

As with the 2010 Plan, the measures focus on either reducing the ROC content of cleaning products, coatings, and other process materials, or reducing NO_x emissions from combustion equipment by employing newer, achieved-in-practice pollution control technology. The six control measures proposed for adoption in the 2016 Plan were all included in the 2010 Plan; they are a subset of the control measures that were analyzed in the 2010 Clean Air Plan EIR. Therefore, as concluded in the 2010 Clean Air Plan EIR, implementation of the control measures are not anticipated to result in adverse environmental impacts.

Measures that were included as “Further Study Measures” in the 2010 Plan were not analyzed in the 2010 Clean Air Plan EIR, since they were not yet proposed for implementation. The same logic applies to the “Further Study Measures” identified in the 2016 Ozone Plan, Table 4-3; because they are not proposed for implementation, the environmental impacts are not included in the CEQA analysis. Further study measures will undergo CEQA analysis if proposed for implementation in the future.

TRANSPORTATION CONTROL MEASURES

The 2016 Ozone Plan identifies in Chapter 5 all of the Transportation Control Measures (TCMs) that were adopted in previous air quality attainment plans, including the TCMs from the 2010 Plan. There are no additional TCMs proposed for adoption in the 2016 Plan; all of the previously adopted TCMs will continue to be implemented by local agencies in Santa Barbara County. Since there are no proposed changes to the TCMs that were previously adopted, no adverse environmental impacts are anticipated.

4.0 CONCLUSION

Pursuant to Section 15164 of the State CEQA Guidelines, and the explanation set forth above, the District has prepared this Addendum to the 2010 Clean Air Plan EIR. Section 15164(a) states that, *“The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”* As documented in this addendum, District staff has determined that implementation of the 2016 Ozone Plan will not result in significant new environmental impacts, as compared to the project that was analyzed in the 2010 Clean Air Plan EIR. No new mitigation measures are required.