

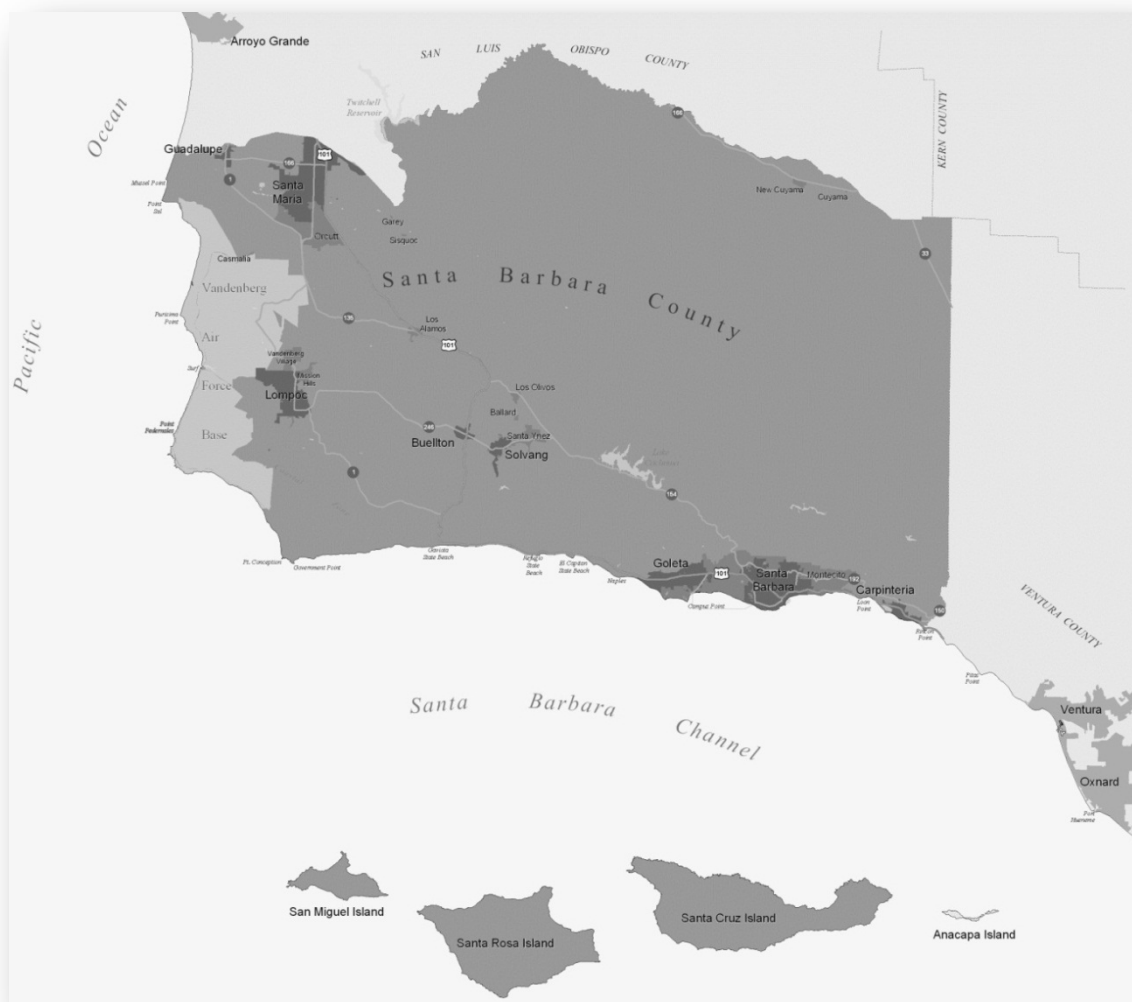
**DRAFT**

**MAY 2013**

# 2013

# CLEAN AIR PLAN

***SANTA BARBARA COUNTY'S PLAN TO ATTAIN THE STATE OZONE STANDARD  
TRIENNIAL UPDATE TO THE 2010 CLEAN AIR PLAN***



**260 N. SAN ANTONIO ROAD, SUITE A  
SANTA BARBARA, CALIFORNIA 93110  
[WWW.SBCAPCD.ORG](http://WWW.SBCAPCD.ORG)  
(805) 961-8800**



**260 N. SAN ANTONIO ROAD, SUITE B  
SANTA BARBARA, CALIFORNIA 93110  
[WWW.SBCAG.ORG](http://WWW.SBCAG.ORG)  
(805) 961-8900**



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# 1. INTRODUCTION

The 2013 Clean Air Plan (Plan) is the sixth triennial update to the initial State Clean Air Plan adopted by the Santa Barbara County [APCDAir Pollution Control District \(District\)](#) Board in 1991. 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 over twenty five control measures controlling stationary source emissions. This has resulted in substantial amounts of reductions in ozone precursor pollutant (nitrogen oxides and reactive organic compounds). To date, this strategy has been successful as our County’s air quality has improved such that we are now in attainment of the state 1-hour ozone standard. While we have yet to attain the state 8-hour ozone standard, we are inching closer.

Because section 40913 of the California Health and Safety Code mandates that the Plan must include a cost-effective strategy to achieve the attainment of the ozone standard, the ~~2013~~ Plan brings us to a crossroads. As we look for possible reductions in stationary source emissions, it is clear the “low hanging fruit” has been picked. Further stationary source control measures will result in small amounts of emission reductions at higher and higher cost. While we are still proposing control measures for stationary sources in our overall strategy (see Chapter 4), it is possible that an individual measure may not be implemented if our Board ultimately determines it is not cost-effective, among other factors. In this Plan we propose to carry forward proposed stationary source control measures from the 2010 Plan that are pending rule adoption except for two which have been reclassified as “further study” measures. However, our primary focus will be on marine shipping emissions. Marine shipping ozone precursor emissions have and will continue to account for the largest percentage of our inventory, over 50%. While the California Air Resources Board’s future on-road vehicle standards for almost zero or zero tailpipe emissions (e.g., Partial Zero Emission Vehicles and Zero Emission Vehicles) will result in substantial emission reductions, without strategies to gain emission reductions from marine shipping, very little additional progress can be made towards attainment of the state 8-hour ozone standard. Chapter 3 provides more detail on the importance of marine shipping to our overall clean air strategy.

The California Clean Air Act (CCAA) requires that we report our progress in meeting state mandates and revise our 1991 Air Quality Attainment Plan to reflect changing conditions on a triennial basis. There are two major items required to be in the triennial update (Sections 40924 and 40925 of the California Health and Safety Code): a triennial progress report and a triennial plan revision. The triennial progress report must assess the overall effectiveness of an air quality program and the extent of air quality improvement resulting from the Plan. The triennial plan revision must also incorporate new data or projections into the Plan. This Plan satisfies all state triennial planning requirements. Table 1 provides a more complete list of triennial plan revision requirements and where those requirements are addressed in the Plan.

**TABLE 1**  
**TRIENNIAL PLAN REVISION REQUIREMENTS**

<b>Requirement</b>	<b>Submittal</b>
Air Quality Analysis	Chapter 2
Population Trends	Chapter 5
Population Exposure	Not available – no longer provided by <a href="#">the Air Resources Board (ARB)</a>
Emission Inventory	Chapter 3
Control Measures	Chapter 4
Control Strategy Cost-Effectiveness	A cost effectiveness analysis of the control measures is included in <u>Appendix A</u> .
Transportation Control Measures	Chapter 5
Vehicle Trips & Vehicle Miles Traveled Trends	Chapter 5
Contingency Measures	Chapter 4
Every Feasible Measure	Chapters 4 and 5
Expeditious Adoption	Chapters 4 and 5
Public Information	<a href="#">APCDDistrict</a> public education efforts are outlined in <i>Chapter 8</i> of the 2001 Plan. <a href="http://www.sbcapcd.org/sbc/download01.htm">http://www.sbcapcd.org/sbc/download01.htm</a>

## 2. LOCAL AIR QUALITY

The California Clean Air Act (CCAA) requires the California Air Resources Board (ARB) to evaluate and identify air quality related indicators for districts to use in assessing their progress toward attainment of the state standards. Districts are required to assess their progress triennially and report to the ARB as part of the triennial plan revisions. The assessment must address (1) the peak concentrations in the peak “hot spot” subarea, (2) the population-weighted average of the total exposure, and (3) the area-weighted average of the total exposure. The exposure data are typically provided by ARB and have been presented in previous plans. ARB, however, is no longer providing area-weighted and population-weighted exposure data to the districts and those data are not available to be included in this plan. The population- and area-weighted exposure data are currently not available from ARB.

The peak “hot spot” indicator is assessed in terms of the Expected Peak Day Concentration (EPDC). The EPDC is provided to districts by the ARB for each monitoring site in the county and represents the maximum ozone concentration expected to occur once per year, ~~on average~~. The EPDC is calculated using ozone data for a three-year period (the summary year and the two years preceding the summary year). For example, the 2011 EPDC for a monitoring site uses data from 2009, 2010 and 2011. The data that are used in the calculation are the daily maximum one-hour and eight-hour ozone concentrations. The EPDC is useful for tracking air quality progress at individual monitoring stations since it is relatively stable, thereby providing a trend indicator that is not heavily influenced by year-to-year changes in weather.

Figures 2-1 and 2-2 show the one-hour and eight-hour EPDC trends for the period 1990 through 2011 for five selected monitoring sites in the county that typically record highest ozone concentrations. These figures show that peak day concentrations have significantly decreased during the period and all sites have one-hour peak day concentrations below the state one-hour ozone standard. Eight-hour peak day concentrations, while showing significant improvement over time, remain above the state eight-hour ozone standard at each of the sites.

Figures 2-3 and 2-4 depict the percent reduction in one-hour and eight hour EPDC values. The one-hour EPDC percent reductions range from 25 percent at the Carpinteria site to 38 percent at the Los Flores Canyon site. The corresponding eight-hour percent reductions range from 20 percent at Carpinteria to 28 percent at Los Flores Canyon.

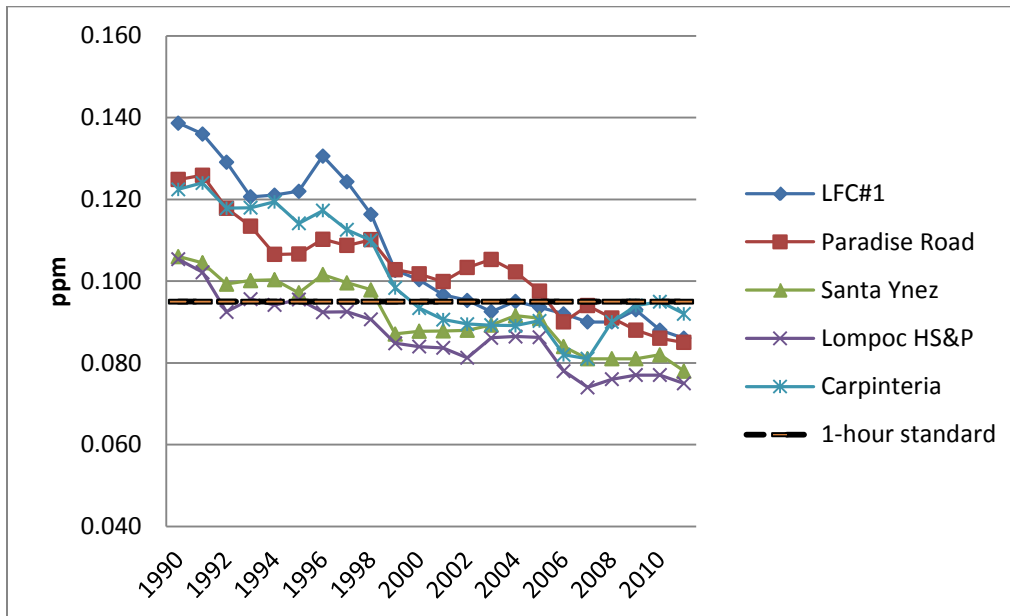
The EPDC data are also used in the area designation process. Designation values are used to determine whether an area is in or out of attainment of applicable air quality standards. In the state designation process, measured concentrations that are high than the EPDC are identified as being affected by an extreme concentration event (e.g., weather conditions conducive to high concentrations of ozone) and are not considered violations of the state standard. The designation value, therefore, is the highest concentration remaining at a given site that is less than or equal to the EPDC. Any designation value that exceeds an applicable standard is considered a violation of that standard. The 2011 designation value for the state one-hour standard is 0.09 ppm, which equals but does not exceed the state one-hour ozone standard keeping Santa Barbara County in attainment for that standard. The 2011 designation for the eight -hour standard is 0.080 ppm, which violates that state eight-hour standard of 0.070 ppm. Thus, Santa Barbara County remains out of attainment for that standard.

Air quality improvement is also seen in the number of state one-hour and eight-hour ozone concentration exceedances that have been experienced in the county between 1990 and 2012. As displayed in Figure 2-5, one-hour ozone exceedances have decreased from a high of 37 days (1990 and 1991) to zero days (2005, 2006 and 2010). The number of eight-hour ozone exceedance days range from a high of 97 days during 1991 to just 3 days during 2011. These significant improvements in air quality have occurred despite a 15 percent increase in county-wide population and an 18 percent increase in daily vehicles miles travelled (VMT) between 1990 and 2011(see Figure 2-6).

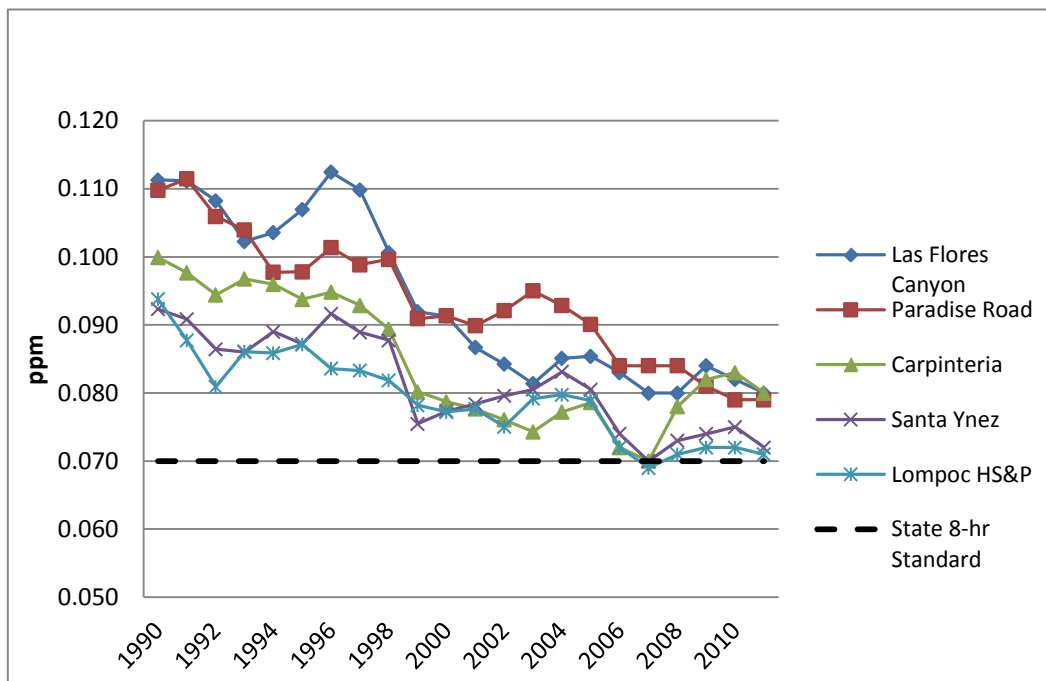
| This ~~2013~~ Plan has been prepared to document progress toward the state one-hour and eight-hour ozone standards. Although Santa Barbara County violates the state eight-hour standard, recent data show that the county continues to attain the state one-hour standard of 0.09 ppm. The county's air quality has improved dramatically over the years as evidenced by the one-hour and eight-hour EPDC data and in the long-term decline in the number of county-wide ozone exceedances.



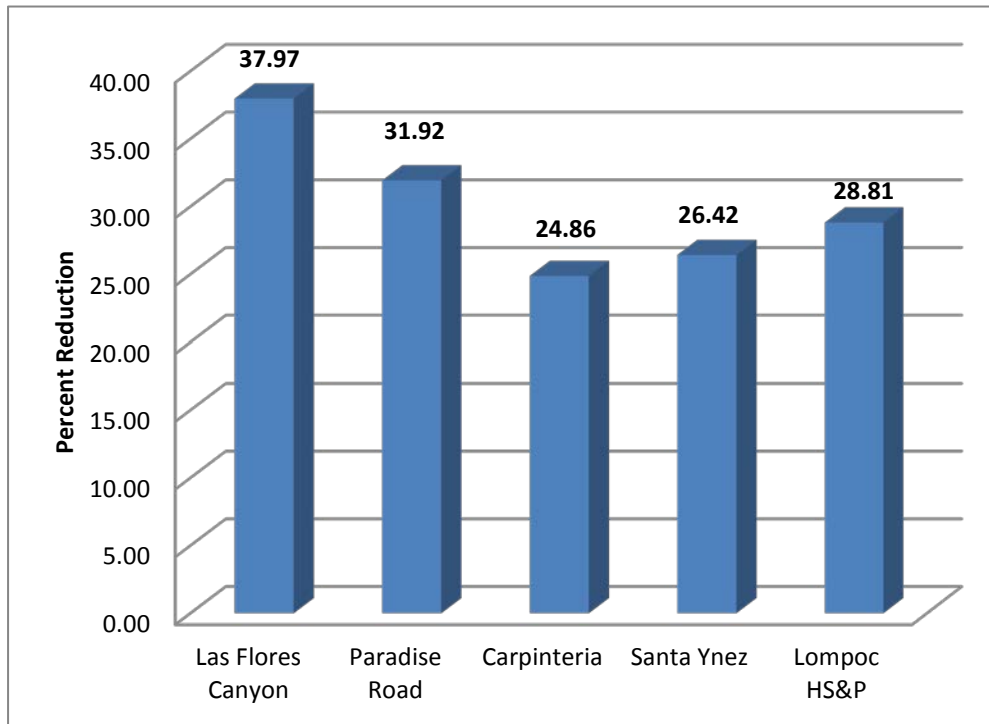
**FIGURE 2-1**  
**STATE 1-HOUR OZONE EXPECTED PEAK DAY CONCENTRATION**  
**TOP FIVE** **SANTA BARBARA COUNTY MONITORING SITES**  
**1990 – 2011**



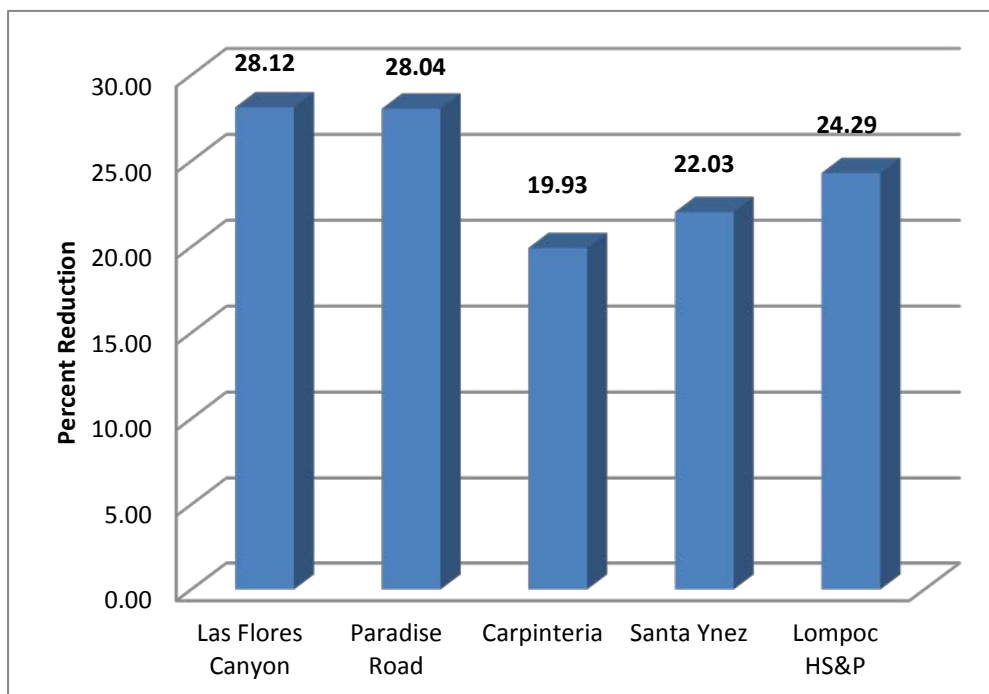
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**1990 – 2011**



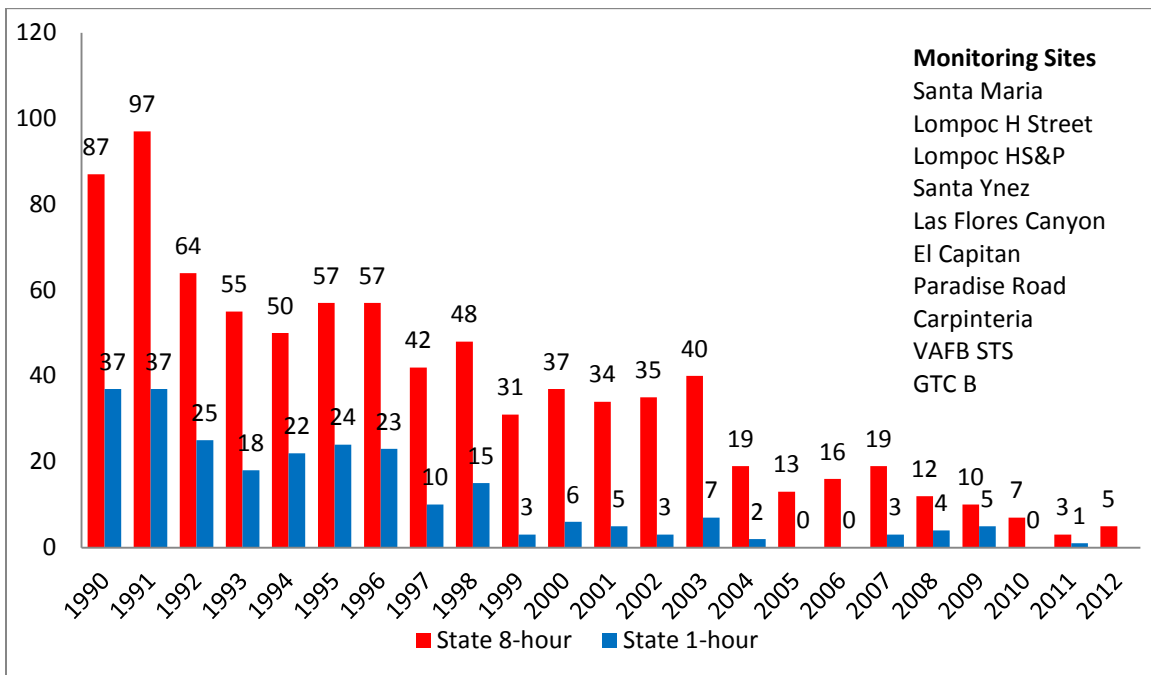
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**1990 – 2011**



**FIGURE 2-4**  
**PERCENT REDUCTION IN EXPECTED PEAK DAY 8-HR OZONE CONCENTRATIONS:**  
**1990 – 2011**

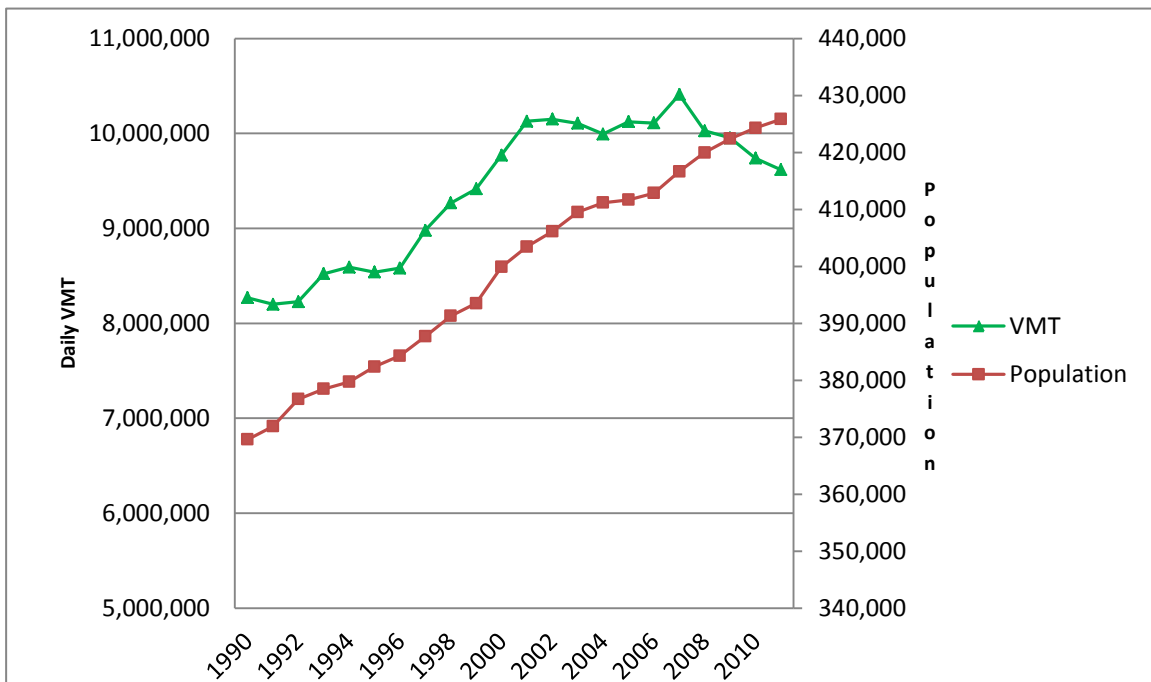


**FIGURE 2-5**  
**1-HOUR AND 8-HOUR OZONE EXCEEDANCE TRENDS**  
**SANTA BARBARA COUNTY**  
**1990 – 2012**



**FIGURE 2-6**  
**POPULATION AND DAILY VMT TRENDS**  
**SANTA BARBARA COUNTY**  
**1990 – 2011**

SOURCES: CALTRANS AND CALIFORNIA DEPARTMENT OF FINANCE





### 3. EMISSION INVENTORY

#### 3.1 INTRODUCTION

This chapter presents the 2008, 2020 and 2030 nitrogen oxides (NO<sub>x</sub>) and reactive organic gas (ROG) emission inventories used in the development of this 2013 Plan. The emission inventories account for the types and amounts of pollutants emitted from a wide variety of sources, including on-road motor vehicles and other mobile sources, fuel combustion at industrial facilities, solvent and surface coating usage, [and consumer product usage](#), ~~and emissions from natural sources.~~

The inventories presented in this Plan are “planning emissions inventories,” commonly referred to as “summer seasonal” inventories. A planning inventory accounts for seasonal variation because most exceedances of ozone standards occur during the April to October ozone season. It does not include the emissions from natural sources such as biogenics, oil and gas seeps, and wildfires since they are not regulated or controlled through implementation of emission control measures. [A discussion of natural source emissions, however, is included in Section 3.5 of this chapter in order to provide additional perspective on the overall emission inventory of Santa Barbara County.](#)

The baseline and projected inventories include emissions from two geographical regions: ***Santa Barbara County*** and the ***Outer Continental Shelf (OCS)***. The Santa Barbara County region encompasses all onshore sources of air pollution within Santa Barbara County and the State Tidelands (three miles from the shoreline). The OCS region includes pollution sources 25 miles beyond the State Tideland boundary offshore of Santa Barbara County.

The baseline (2008) and future year (2020 and 2030) [planning](#) inventories include emissions from the following source categories:

- Stationary Sources - these sources are subject to District permitting requirements.
- Area-Wide Sources – these sources are not subject to District permitting requirements. Emissions from area sources are geographically dispersed throughout the county.
- Mobile Sources – this source type is subdivided into two categories:
  - On-Road Mobile sources – these are vehicles driven on roads and highways.
  - Other Mobile Sources – this category pertains to emission sources that do not produce emissions on roads and highways. These include ships, boats, airplanes, trains, and construction and mining equipment.

#### 3.2 BASELINE INVENTORY

The emissions inventory is divided into four major classifications: point, area, on-road, and off-road sources. The 2008 base year point source emissions are based on annual data from facilities reported to the District. The area source emissions are estimated jointly by California Air Resources Board (ARB) and the District. On-road emissions are calculated by applying ARB’s EMFAC2011 emission factors to the transportation activity data provided by the Santa Barbara

County Association of Governments (SBCAG). ARB provides off-road emissions, such as ocean-going vessels, locomotives, agricultural equipment and aircraft.

Table 3-1 and Figure 3-1 show the emissions and relative contribution of ROG and NOx during 2008 for each source category. As presented in the figure, 72 percent of the NOx inventory is attributed to sources in the other mobile sources category. A majority of these emissions are from ocean-going vessels in the OCS (see section 3.4 for further discussion of marine shipping emissions). An additional 18 percent of the NOx emissions in the baseline inventory are from on-road cars and trucks. Area-wide and stationary sources contribute the remaining 10 percent of the baseline NOx emissions.

Stationary and area-wide sources account for about 63 percent of the baseline ROG inventory. On-road mobile sources account for 18 percent of the baseline ROG emissions with the remaining 19 percent coming from sources in the Other Mobile category.

### 3.3 INVENTORY TRENDS

To forecast future year emissions for stationary and area sources, the estimated changes in the level of pollution producing activities, known as “activity indicators,” are used to grow the 2008 baseline inventory (see Table 3-2). Examples of activity indicators include population, housing and employment. SBCAG provided several of the activity indicator estimates. The ARB is responsible for growing a majority of sources within the area-wide and other mobile source categories. This is accomplished through ARB’s California Emission Projection Analysis Model (CEPAM). CEPAM incorporates county-specific economic and demographic growth profiles and emission control factors that are derived from adopted and proposed District rules and statewide regulations. Note that the activity factors for oil and gas related activity have been set to one, due to growth uncertainty in that sector over the long-term. This is based on three considerations:

- 1) While some major oil and gas project are on the horizon, stringent Best Available Control Technology (BACT) typically will be required during the permit process. This low emission control technology improves over time and drives down overall project emissions (e.g., NOx emissions from steam generators decreased 50 parts per million in the past to BACT levels as low as 5 parts per million today).
- 2) Some larger oil and gas projects on the horizon have already obtained emission reduction credits (ERCs). As discussed below, ERCs are accounted for as forecasted growth, and thus already cover to some extent growth in this industry.
- 3) The Plan activity indicators cover a long-term period out to 2030. From Figure 3-2, it can be seen that trends in emissions and oil production vary, and projecting emission growth out to 2030 would be speculative.

The Plan ~~In addition,~~ forecasted emission inventories ~~must be~~ are adjusted upwards for the most recent emission reduction credits (based on the ERCs) that were in the District Source Register as of January 2013. ERCs are previous voluntary emission reductions that can be credited to allow increased emissions from a new or modified stationary source. Total available ERCs in the Source Register for Santa Barbara County as of January 2013 were 0.29 tons per day of ROG and 0.63 tons per day of NOx.

This Plan, as in past Plans adopted by the District Board and submitted to ARB, includes a growth allowance. Unlike past plans, this plan includes a growth allowance specifically to allow for potential increases in emissions from new or modified sources that are unable to offset their emission increases. Following are examples of how the growth allowance could function:

- It could serve as a buffer in conjunction with a program by which permit applicants fund an account managed by the District to obtain offset credits from clean air projects in Santa Barbara County.
- A portion of the allowance could be allocated to facilitate permitting of “essential public service” projects in Santa Barbara County.

The growth allowance is a combined 1.36 tons per day of NOx and ROG and can be used to offset either or both pollutants. The quantity of the allowance is specified in The tables and figures in this chapter assign this allowance to the stationary source category and split it equally to NOx and ROG (0.68 tons per day of each). These emissions have been accounted for in the forecast of future emissions and are 1.6 % of the 2030 forecasted emissions. The forecast shows a 17.6 TPD-tons per day overall decrease in ozone precursor emissions between 2008 (baseline) and 2030 (see Figure 3-23-3). This projected decrease in countywide emissions in conjunction with the observed 28% decrease in the Expected Peak Day Concentration values for 8-hour ozone from 1990 to 2011 (see Chapter 2) shows that the growth allowance will not impair progress towards attaining the State 8-hour ozone standard.

Any growth allowance approved by this Plan could only be implemented in accordance with further amendments to District Rules and Regulations to allow for this option. Thus, rule-based mitigation will act as a control on overall emissions growth.

Table 3-1 and Figure 3-23-3 display District-wide ozone precursor emission forecasts out to 2030. The emission estimates incorporate local, state, federal and international control strategies as well as forecasted growth. As shown in the figure, combined NOx emissions for Santa Barbara County and the OCS are projected to decrease substantially over the next several years. Emissions of NOx are projected to decrease from 71.70 tons per day in 2008 to 55.8755.86 tons per day by 2030. This substantial long-term NOx reduction is primarily derived from reductions in emissions from on-road cars and trucks and offroad equipment.

The ROG emissions trend remains relatively flat over the period with about a 4.31.8 tons per day decrease from 2008 to 2030. Decreases in on-road emissions account for most of the ROG reductions over the period.

**TABLE 3-1**  
**ROG AND NO<sub>x</sub> EMISSION TRENDS (TONS PER DAY)<sup>a</sup>**

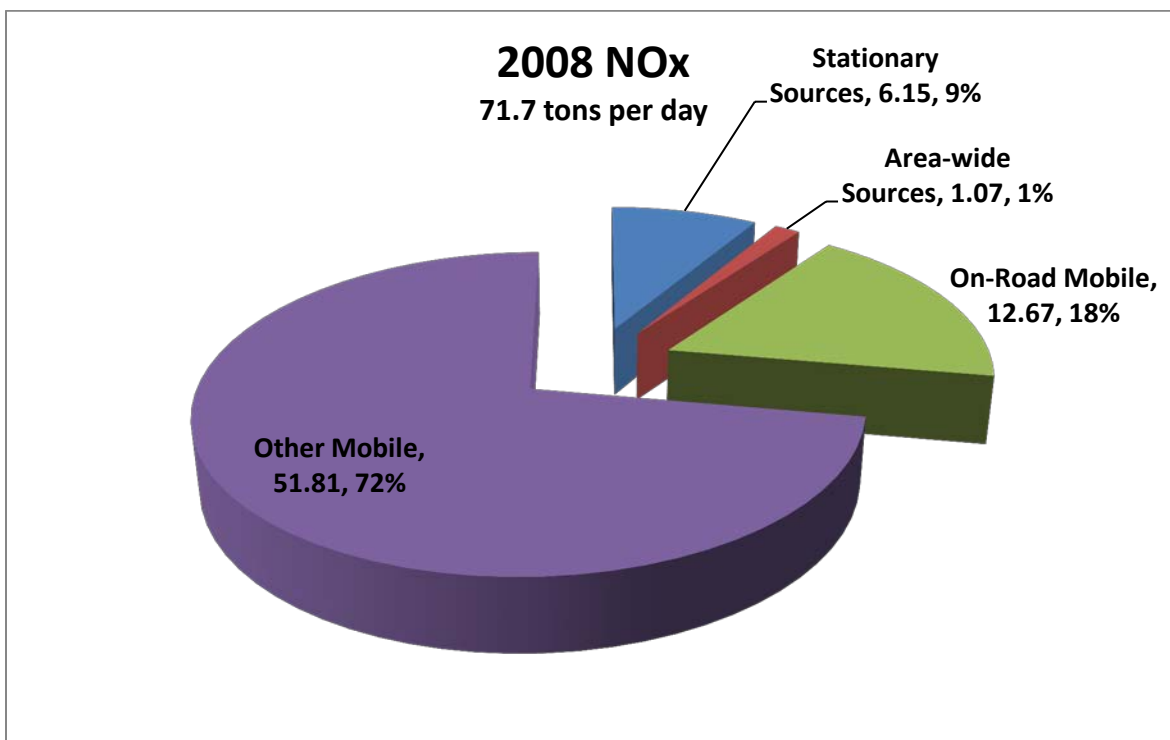
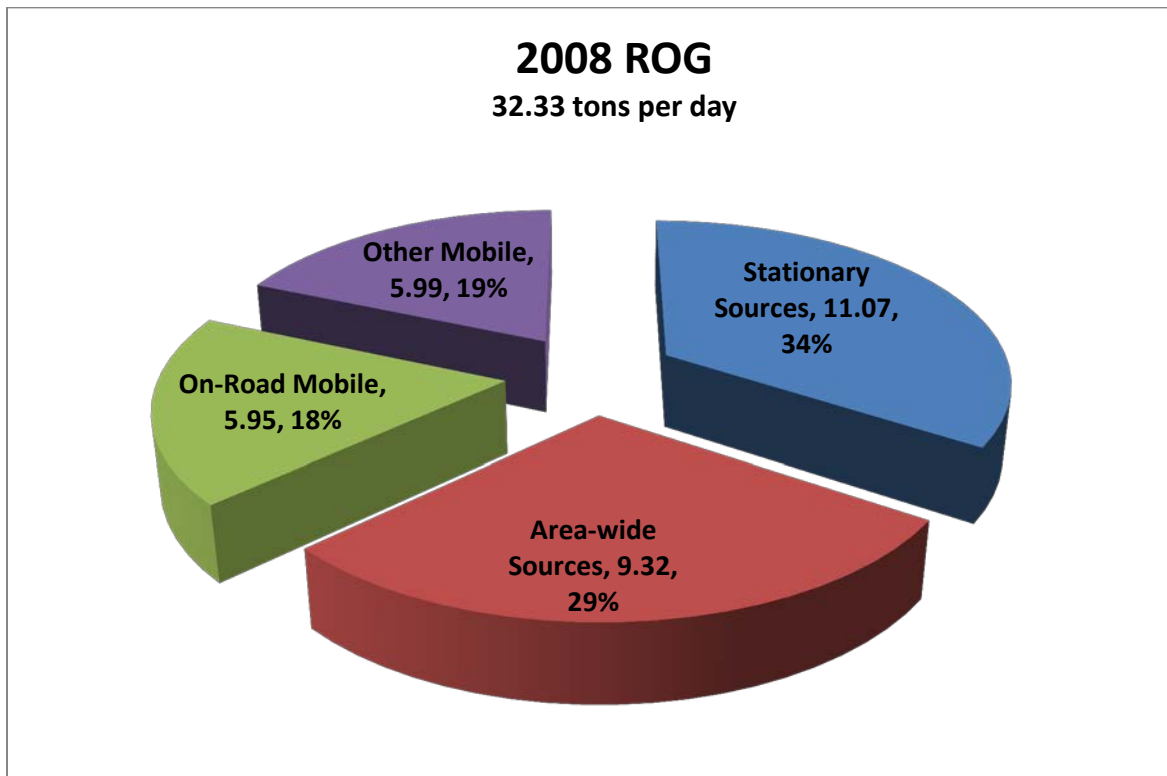
	2008		2020		2030	
	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>ROG</b>	<b>NO<sub>x</sub></b>
Stationary Sources	11.07	6.15	<del>10.76</del> <u>10.31</u>	<del>5.59</del> <u>5.58</u>	<del>10.97</del> <u>10.50</u>	<del>5.38</del> <u>5.37</u>
Area-wide Sources	9.32	1.07	9.08	0.71	9.23	0.81
On-Road Mobile	5.95	12.67	1.94	4.30	1.52	2.77
Other Mobile <sup>b</sup>	4.39	10.81	3.27	7.26	2.93	5.53
Marine Shipping	1.60	41.00	3.09	49.68	5.39	40.07
Growth Allowance	-	-	0.68	0.68	0.68	0.68
ERC's	-	-	0.29	0.63	0.29	0.63
Total	32.33	71.7	<del>29.11</del> <u>28.66</u>	<del>68.85</del> <u>68.84</u>	<del>31.01</del> <u>30.54</u>	<del>55.87</del> <u>55.86</u>

<sup>a</sup> See Table 3-3 for a listing of emissions by individual source category.

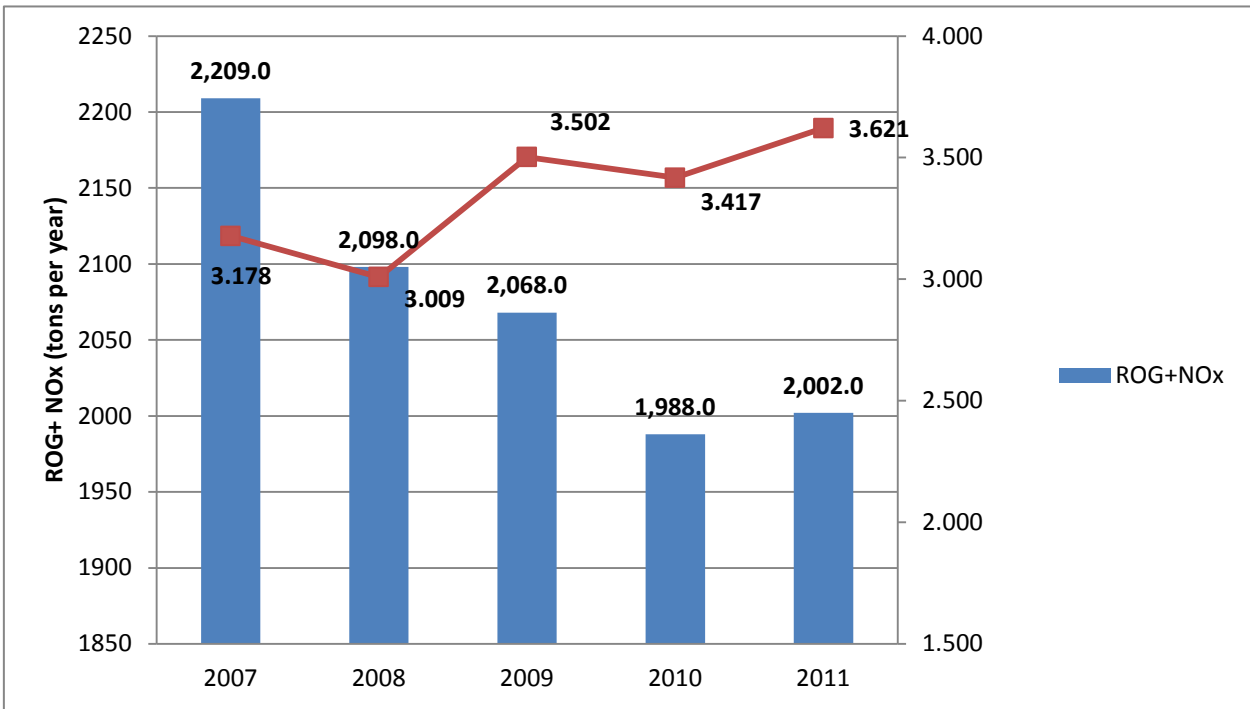
<sup>b</sup> Marine Shipping emissions have been broken-out of the Other Mobile category in this table.



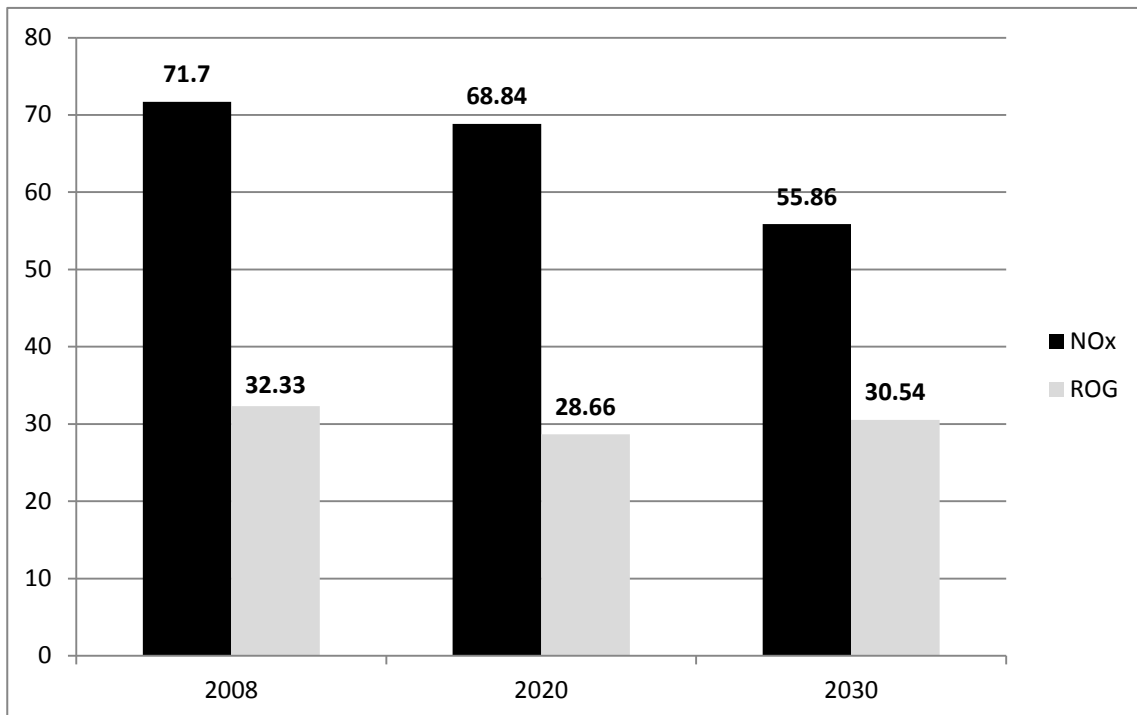
**FIGURE 3-1**  
**2008 BASELINE ROG AND NO<sub>x</sub> EMISSIONS (TONS PER DAY) AND DISTRIBUTION (%)**



**FIGURE 3-2**  
**OIL PRODUCTION (MILLION BBLs) VS. O&G SECTOR ROG +NOx EMISSIONS**  
**(TONS PER YEAR)**



**FIGURE 3-23-3**  
**SANTA BARBARA COUNTY ROG AND NOx TRENDS 2008 TO 2030**  
**(TONS PER DAY)**



**TABLE 3-2**  
**SANTA BARBARA COUNTY GROWTH FACTORS**

Activity Indicator	Units	Value			Factor	
		2008	2020	2030	2020	2030
Commercial Employment	Employees	111,300	128,600	138,200	1.1554	1.2417
Industrial Employment	Employees	23,800	22,200	22,000	0.9328	0.9244
Public Services	Employees	37,300	39,400	41,000	1.0563	1.0992
Housing	Households	141,385	151,100	170,500	1.0687	1.2059
Population	Residents	418,309	445,900	495,000	1.0660	1.1833
OCS Production	No Units	1	1	1	1	1
Petroleum Production	No Units	1	1	1	1	1
Petroleum Wells	No Units	1	1	1	1	1

### 3.4 IMPACTS FROM MARINE SHIPPING EMISSIONS

Large ships traveling along the coast of Santa Barbara County produce significant air emissions. While the County does not have a port, the location of internationally-designated shipping lanes in the Santa Barbara Channel means that ships are traveling along an approximately 100 mile stretch of water off the County's coastline. In the base year (2008), ship transits through the Channel numbered approximately 6,000.

Specifically, as displayed in Figure [3-33-4](#) below, base-year NOx emissions from marine shipping comprise over 50 percent of the Countywide planning inventory. This is by far the single largest (manmade) source of ozone-precursor emissions in the County.

**FIGURE 3-33-4**  
**2008 NO<sub>x</sub> EMISSIONS (Tons per Day) AND DISTRIBUTION (%)**

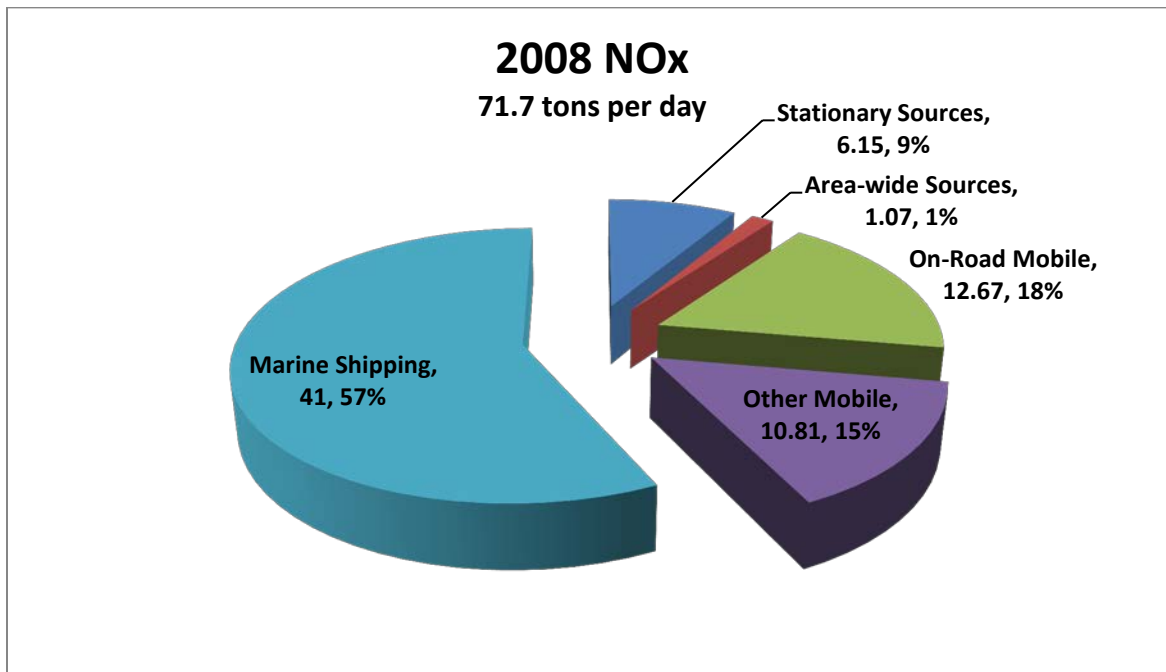


Figure 3-43-5 below shows that marine shipping emissions in 2030 are forecasted to remain relatively unchanged from baseline levels. While the inventory projects shipping growth in the near term, beginning in 2016 more stringent engine NO<sub>x</sub> standards for new engines will be phased in under International Maritime Organization (IMO) and United States Environmental Protection Agency regulations. Marine engines typically have a long life-span, thus Emission-emission reductions from the introduction of cleaner ship engines are expected to slowly counteract the anticipated growth in the shipping industry. However, by 2030, shipping emissions will represent an even greater total percentage of the County total ozone-precursor inventory (i.e., 72% of emissions).

**FIGURE 3-43-5**  
**2030 NOx EMISSIONS (TPD) AND DISTRIBUTION (%)**

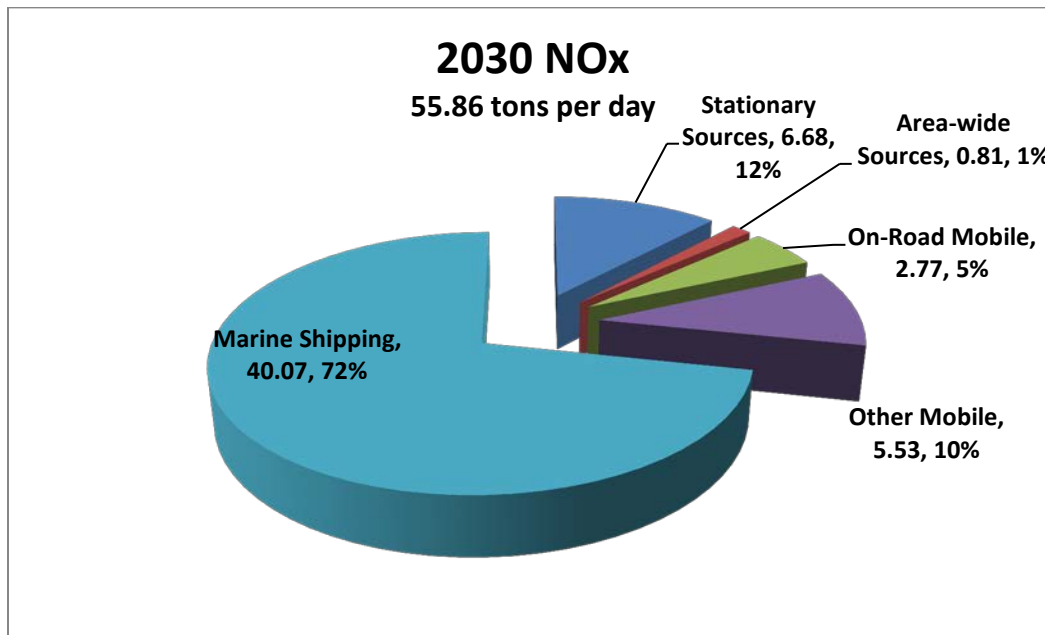


Figure 3-43-5 is based on ARB estimates for Santa Barbara County for base (2008) and future year (2020 and 2030) NOx and ROG marine shipping emissions, using the California Emissions Projection Analysis Model (CEPAMS). The emissions are associated with all shipping activity from the shoreline out to 24 nautical miles. Projections include both shipping growth (based on trends in growth of net registered tonnage) and the phase-in of fuel and engine standards.

While the ARB has made every effort to provide accurate forecasts of future marine shipping emissions in Santa Barbara County, it is important to note that there is inherent uncertainty about future emissions from marine shipping, due to a wide range of factors, including the pace of economic recovery and changing traffic patterns within the Santa Barbara Channel. Review of actual ship transit data from the past few years, however, suggests that ARB may be over-estimating near-term shipping growth. ARB is projecting that peak emissions from shipping will occur in 2016 then steadily decline to approximately base-year levels by 2030. Available ship transit data, however, show that shipping activity has yet to reach peak levels that were realized in 2006 and the actual annual growth rate is not consistent with ARB projections. It is expected that there will be full recovery in the shipping industry sometime within the long-term planning horizon, however, and ARB's projections for 2030 appear to be reasonable.

### Strategies to Reduce Shipping Emissions

The District has worked for decades to raise awareness of the problem of marine shipping emissions, identifying these emissions in *Clean Air Plans* since 1994, and calling for regulations to reduce this large source of emissions. Significant gains have been made, and state, federal, and international measures are now in place that will reduce this pollution over the long term. Even with these gains, air pollution produced by ships transiting off the coast will overwhelm onshore

efforts to reduce pollution in Santa Barbara County. Achieving additional NOx reductions from shipping is key to ensuring continued progress towards attainment of the state ozone standard.

Vessel speed reduction (VSR) is one promising strategy. We estimate a 55 percent reduction in NOx could be achieved from the shipping sector if all ships reduced speeds down to 12 knots from baseline year average speeds in the Santa Barbara Channel. This corresponds to an overall countywide reduction of 31% of NOx relative to the 2008 baseline inventory. In addition, speed reduction would have the co-benefits of reducing greenhouse gases, particulate matter, and sulfur dioxide emissions.

We plan to explore a VSR strategy in three ways.

- 1) Track and encourage regulation at the state level. The ARB is currently conducting a feasibility study of statewide VSR as part of evaluation of GHG reduction strategies under AB32. This would have the co-benefit of resulting in substantial NOx and ROC reductions.
- 2) Assess legal authority and feasibility for implementing local regulations focused on VSR. Pursue rulemaking as appropriate.
- 3) On a parallel track, develop a voluntary, incentive-based VSR program for potential implementation. A program could be modeled after the successful voluntary incentive programs in place at the Ports of Long Beach and Los Angeles. The target speed would be 12 knots consistent with the port programs.

An initial study for a VSR initiative program would need to: identify current baseline speeds and emission reduction potential if ship speeds are reduced to 12 knots; explore incentive pricing, and work with shipping operators for input on pricing and program structure, including geographical extent of VSR zone(s); design system for registration and speed compliance tracking; and investigate implementation options. Full implementation would depend upon obtaining a long-term funding source. Thus, close coordination with the State and other partners would be essential in this effort.

A VSR strategy has numerous potential benefits. It can be implemented by all ships, without capital investments, it reduces other pollutants in addition to NOx, and cuts fuel use and greenhouse gas emissions. A VSR incentive approach is successful at two Southern California ports, and employs well-understood ship speed compliance tracking and emission reduction calculations. In addition, VSR is the only emission-reduction strategy that also addresses the problem of lethal ship strikes on whales off the coast. The Santa Barbara Channel is a seasonal feeding ground and migration path for several whale species, including blues, grays, fins, and humpbacks, which travel in and around the shipping lanes.

The District has been active in pursuing a VSR strategy, meeting with other air districts, the Ports of Los Angeles and Long Beach, shipping emissions professionals, shipping industry representatives, and a range of other experts to develop information and refine a plan. The District has reached out to potential partners and stakeholders including the Maersk Shipping Line, National Oceanic and Atmospheric Administration (Channel Islands National Marine Sanctuaries and the National Marine Fisheries Service), the Marine Exchange of Southern California, the University of California at

Santa Barbara Bren Graduate School, and several not-for-profit organizations. The District formed a Marine Shipping Solutions group of stakeholders in 2012, and held several informational meetings featuring speakers from the shipping industry, ports, and whale research.

We will continue to pursue efforts to craft a path forward with a VSR strategy.

We will also explore other promising strategies for achieving NO<sub>x</sub> reductions, including use of emission-reduction practices and technologies by the shipping industry. Ports offer a useful model in this area as well. As part of the Technology Advancement Program as described in the *San Pedro Bay Ports Clean Air Action Plan*, the Ports of Long Beach and Los Angeles are examining main engine retrofits (selective catalytic reduction, sea water scrubbers dry low NO<sub>x</sub> combustion), more efficient fuel injectors (slide valves) and techniques for operating main engines in a low-NO<sub>x</sub> emissions mode. Heat recovery systems are another technology with potential to reduce fuel use and cut emissions.

The Port of Los Angeles is incentivizing use of some of these practices and technologies by ships calling at the Port, employing the Environmental Ship Index (ESI), a mechanism that may prove useful to implementation of emission-reduction strategies along our coastline.

We will continue to track developments in the shipping industry, as well as in emission-reduction strategies, as we make a concerted effort to reduce the shipping sector NO<sub>x</sub> emissions in our inventory.

### **3.5 NATURAL SOURCES**

Natural source emissions are those that are not man-made. Emission estimates for these sources tend to be difficult to quantify with any degree of certainty. As discussed in Section 3.1, emissions from natural sources are not included in the planning emission inventory because these sources are not regulated or controlled through implementation of emission control measures.

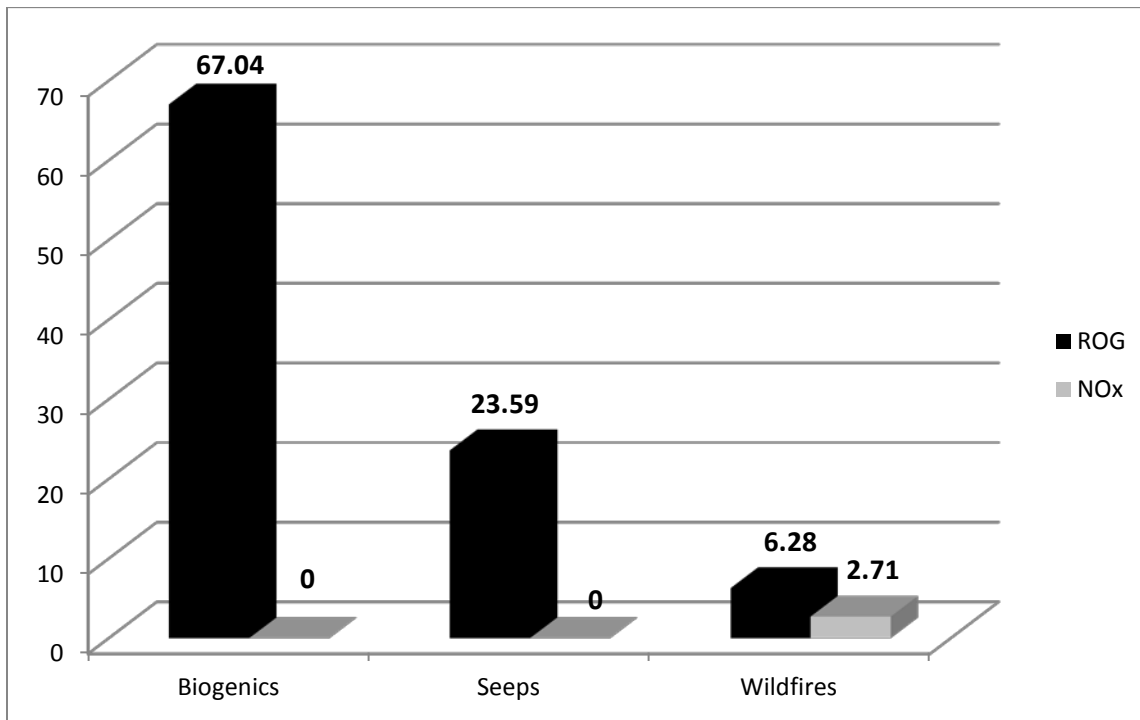
There are three primary categories of natural source emissions:

1. Biogenic Sources: Biogenic emissions are emissions from plants and trees. The California Air Resources Board estimates emissions of biogenic volatile organic compounds (BVOCs) from vegetation for natural areas, crops, and urban vegetation using their BEIGIS model. The main inputs to BEIGIS are land use and vegetation land cover maps, gridded leaf area indices derived from satellite data, leaf area/dry leaf mass factors, base emission rates, and gridded hourly ambient temperature and light intensity data.
2. Geogenic Sources: Geogenic sources are naturally occurring oil and gas seeps located off the southern coast of Santa Barbara County. Seep emissions flow out from subsurface sources on the ocean floor, primarily in the State Tidelands and exhibit a high degree of temporal and spatial variability. We have worked in cooperation with the Institute of Crustal Studies at the University of California at Santa Barbara to determine estimates of seep emissions in the Santa Barbara Channel. The results of their research have been used in this inventory.

3. Wildfires: This category includes emissions from timber, grass and brush wildfires. Wildfire emissions are calculated by the ARB using a GIS-based fire emissions model. Wildfire emissions during 2008 are associated with the Gap Fire that burned 9,500 acres and the Tea Fire that burned approximately 1,940 acres.

Figure 3-6 provides ROG and NOx emissions from natural sources. Total ROG emissions from natural sources during 2008 were 96.91 tons per day. Biogenic emissions comprise about 69% of ROG from natural sources. The only NOx contribution to the natural source inventory is from wildfires. NOx emissions from wildfires were 2.71 tons per day during 2008.

**FIGURE 3-6**  
**2008 NATURAL SOURCE ROG AND NOx EMISSIONS**  
**(TONS PER DAY)**





**TABLE 3-3**  
**EMISSIONS BY SOURCE CATEGORY (TONS PER DAY)**

	2008		2020		2030	
	NO <sub>x</sub>	ROG	NO <sub>x</sub>	ROG	NO <sub>x</sub>	ROG
<b>Stationary Sources</b>						
ELECTRIC UTILITIES	0.0042	0.0019	0.0042	0.0019	0.0042	0.0019
COGENERATION	0.1262	0.0338	0.1262	0.0338	0.1262	0.0338
OIL AND GAS PRODUCTION (COMBUSTION)	1.8147	0.1212	<del>1.8147</del> <u>1.8072</u>	0.1212	<del>1.8147</del> <u>1.8056</u>	0.1212
PETROLEUM REFINING (COMBUSTION)	0.0139	0.0006	0.0073	0.0006	0.0073	0.0006
MANUFACTURING AND INDUSTRIAL	1.0537	0.0699	0.9818	0.0652	0.9730	0.0646
FOOD AND AGRICULTURAL PROCESSING	2.3485	0.1640	1.8365	0.1216	1.6043	0.1053
SERVICE AND COMMERCIAL	0.5897	0.0598	0.6230	0.0626	0.6500	0.0644
OTHER (FUEL COMBUSTION)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SEWAGE TREATMENT	0.0022	0.0020	0.0024	0.0020	0.0025	0.0023
LANDFILLS	0.0042	0.1127	0.0045	0.1201	0.0050	0.1334
INCINERATORS	0.0027	0.0002	0.0029	0.0003	0.0030	0.0003
SOIL REMEDIATION	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OTHER (WASTE DISPOSAL)	0.0000	0.9392	0.0000	0.9092	0.0000	1.0092
LAUNDERING	0.0000	0.0050	0.0000	0.0054	0.0000	0.0060
DEGREASING	0.0000	2.28878	0.0000	<del>2.1289</del> <u>1.6536</u>	0.0000	<del>2.1228</del> <u>1.6390</u>
COATINGS AND RELATED PROCESS SOLVENTS	0.0000	2.1204	0.0000	2.1299	0.0000	2.1765
PRINTING	0.0000	<del>0.4804</del> <u>0.4812</u>	0.0000	<del>0.4577</del> <u>0.4583</u>	0.0000	<del>0.5080</del> <u>0.5087</u>
ADHESIVES AND SEALANTS	0.0000	0.8247	0.0000	<del>0.7485</del> <u>0.7664</u>	0.0000	<del>0.7485</del> <u>0.7595</u>
OTHER (CLEANING AND SURFACE COATINGS)	0.0000	0.1056	0.0000	0.0985	0.0000	0.0977
OIL AND GAS PRODUCTION	0.0762	2.9636	0.0762	2.9636	0.0762	2.9636
PETROLEUM REFINING	0.0002	0.0404	0.0002	0.0404	0.0002	0.0404
PETROLEUM MARKETING	0.0000	0.5432	0.0000	0.5468	0.0000	0.5532
CHEMICAL	0.0000	0.0176	0.0000	0.0165	0.0000	0.0163
FOOD AND AGRICULTURE	0.0000	0.1126	0.0000	0.1301	0.0000	0.1399
MINERAL PROCESSES	0.0306	0.0046	0.0286	0.0043	0.0283	0.0042
ELECTRONICS	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OTHER (INDUSTRIAL PROCESSES)	0.0839	0.0546	0.0839	0.0546	0.0839	0.0546
<b>Stationary Sources Total</b>	<b>6.1509</b>	<b><del>11.0667</del> <u>11.0676</u></b>	<b><del>5.5924</del> <u>5.5849</u></b>	<b><del>10.7637</del> <u>10.3069</u></b>	<b><del>5.3788</del> <u>5.3697</u></b>	<b><del>10.9687</del> <u>10.4966</u></b>

	2008		2020		2030	
	NOx	ROG	NOx	ROG	NOx	ROG
<b>Area Sources</b>						
CONSUMER PRODUCTS	0.0000	2.5704	0.0000	2.2875	0.0000	2.3999
ARCHITECTURAL COATINGS AND RELATED PROCESS SOLVENTS	0.0000	1.3467	0.0000	1.3107	0.0000	1.3107
PESTICIDES/FERTILIZERS	0.0000	3.1925	0.0000	4.2148	0.0000	4.2148
ASPHALT PAVING / ROOFING	0.0000	0.2352	0.0000	0.3076	0.0000	0.3076
RESIDENTIAL FUEL COMBUSTION	1.0436	1.1504	0.7088	0.1943	0.8067	0.2316
FARMING OPERATIONS	0.0000	0.7399	0.0000	0.7395	0.0000	0.7395
CONSTRUCTION AND DEMOLITION	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PAVED ROAD DUST	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
UNPAVED ROAD DUST	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
FUGITIVE WINDBLOWN DUST	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
FIRES	0.0011	0.0036	0.0012	0.0038	0.0012	0.0038
MANAGED BURNING AND DISPOSAL	0.0275	0.0824	0.0037	0.0263	0.0037	0.0263
COOKING	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OTHER (MISCELLANEOUS PROCESSES)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Area Source Total</b>	<b>1.0722</b>	<b>9.3211</b>	<b>0.7137</b>	<b>9.0845</b>	<b>0.8116</b>	<b>9.2342</b>
<b>On-Road Mobile Sources</b>						
LIGHT DUTY PASSENGER (LDA)	2.2513	2.3038	0.4951	0.4462	0.3829	0.3184
LIGHT DUTY TRUCKS - 1 (LDT1)	0.3724	0.4021	0.0842	0.0762	0.0443	0.0498
LIGHT DUTY TRUCKS - 2 (LDT2)	2.0908	1.2189	0.4616	0.3523	0.2591	0.2681
MEDIUM DUTY TRUCKS (MDV)	1.3717	0.6270	0.5506	0.3691	0.3044	0.2917
LIGHT HEAVY DUTY GAS TRUCKS - 1 (LHDV1)	0.5744	0.4088	0.3072	0.1860	0.2205	0.1145
LIGHT HEAVY DUTY GAS TRUCKS - 2 (LHDV2)	0.0479	0.0418	0.0247	0.0113	0.0174	0.0074
MEDIUM HEAVY DUTY GAS TRUCKS (MHDV)	0.1618	0.1009	0.0500	0.0253	0.0245	0.0152
HEAVY HEAVY DUTY GAS TRUCKS (HHDV)	0.0459	0.0266	0.0320	0.0059	0.0257	0.0036
LIGHT HEAVY DUTY DIESEL TRUCKS - 1 (LHDV1)	1.0107	0.0483	0.4312	0.0300	0.2406	0.0204
LIGHT HEAVY DUTY DIESEL TRUCKS - 2 (LHDV2)	0.2680	0.0125	0.1090	0.0074	0.0575	0.0049
MEDIUM HEAVY DUTY DIESEL TRUCKS (MHDV)	1.4489	0.0822	0.3706	0.0224	0.2069	0.0219
HEAVY HEAVY DUTY DIESEL TRUCKS (HHDV)	1.9310	0.1014	0.6515	0.0417	0.4195	0.0509
MOTORCYCLES (MCY)	0.1096	0.4368	0.0999	0.2997	0.1056	0.3164
HEAVY DUTY DIESEL URBAN BUSES (UB)	0.3601	0.0134	0.2925	0.0113	0.2580	0.0102

	2008		2020		2030	
	NOx	ROG	NOx	ROG	NOx	ROG
HEAVY DUTY GAS URBAN BUSES (UB)	0.0331	0.0286	0.0317	0.0278	0.0218	0.0058
SCHOOL BUSES - GAS (SBG)	0.0128	0.0124	0.0091	0.0056	0.0061	0.0028
SCHOOL BUSES - DIESEL (SBD)	0.2005	0.0146	0.1491	0.0026	0.0927	0.0035
OTHER BUSES - GAS (OBG)	0.0513	0.0217	0.0262	0.0114	0.0136	0.0080
OTHER BUSES - MOTOR COACH - DIESEL (OBC)	0.1216	0.0060	0.0371	0.0024	0.0239	0.0030
ALL OTHER BUSES - DIESEL (OBD)	0.0790	0.0056	0.0283	0.0012	0.0142	0.0014
MOTOR HOMES (MH)	0.1226	0.0387	0.0594	0.0066	0.0350	0.0022
<b>On-Road Mobile Sources Total</b>	<b>12.6654</b>	<b>5.9521</b>	<b>4.3010</b>	<b>1.9424</b>	<b>2.7742</b>	<b>1.5201</b>
<b>Other Mobile Sources</b>						
AIRCRAFT	0.8552	0.3044	1.0298	0.3367	1.0297	0.3366
TRAINS	2.6335	0.1763	2.2424	0.0903	1.5621	0.0593
SHIPS AND COMMERCIAL BOATS	0.3396	0.0113	0.3247	0.0104	0.3247	0.0104
OCEAN GOING VESSELS	40.9990	1.6020	49.6790	3.0920	40.0710	5.3930
COMMERCIAL HARBOR CRAFT	2.2254	0.1918	1.2444	0.1525	1.1224	0.1512
RECREATIONAL BOATS	0.0716	0.4609	0.0938	0.5250	0.0959	0.3931
OFF-ROAD RECREATIONAL VEHICLES	0.0444	0.8429	0.0521	0.6776	0.0665	0.6935
OFF-ROAD EQUIPMENT	2.2782	1.6585	1.0222	1.0559	0.7263	0.9952
FARM EQUIPMENT	2.3620	0.4703	1.2519	0.2213	0.5984	0.1400
FUEL STORAGE AND HANDLING	0.0000	0.2712	0.0000	0.1994	0.0000	0.1520
<b>Other Mobile Source Total</b>	<b>51.8089</b>	<b>5.9896</b>	<b>56.9403</b>	<b>6.3611</b>	<b>45.5970</b>	<b>8.3243</b>
<b>Growth Allowance</b>			<b>0.6800</b>	<b>0.6800</b>	<b>0.6800</b>	<b>0.6800</b>
<b>Emission Reduction Credits</b>			<b>0.6300</b>	<b>0.2900</b>	<b>0.6300</b>	<b>0.2900</b>
<b>GRAND TOTAL FOR SANTA BARBARA COUNTY</b>	<b>71.6974</b>	<b>32.3295</b>	<b>68.8574</b> <b>68.8499</b>	<b>29.1217</b> <b>28.6649</b>	<b>55.8716</b> <b>55.8625</b>	<b>31.0173</b> <b>30.5452</b>



## 4. EMISSION CONTROL MEASURES

### 4.1 INTRODUCTION

This chapter summarizes emission control measures adopted and proposed by the Santa Barbara County Air Pollution Control District (District) to reduce ROC or NO<sub>x</sub> emissions, and identifies additional *stationary source* control measures for further study. This chapter also addresses the state triennial plan assessment and update requirements specified in Health and Safety Code Sections 40924 and 40925. Control measures that focus on reducing local transportation-related emissions are discussed in *Chapter 5 – Transportation Control Measures*.

Control measures are evaluated and classified as *adopted*, *proposed*, *contingency*, or *further study*, based on an analysis of the measures' applicability to Santa Barbara County, potential emission reductions, and the implementation of similar measures in other areas of California. The following describes the control measure classes:

- ❖ ***Adopted*** control measures are those that the District has formally adopted as District rules. Table 4-1 identifies the control measures adopted or modified within the reporting period (2010 to 2012) for this 2013 Clean Air Plan (Plan).
- ❖ ***Proposed*** control measures are those that the District plans to adopt for the purposes of 1) maintaining the state 1-hour ozone standard, and 2) attaining the state 8-hour ozone standard. These measures are scheduled as either near-term (2013 to 2015) or mid-term (2016 to 2018). Table 4-2 shows the proposed control measures for this Plan.
- ❖ ***Contingency*** control measures are those that are required by Section 40915 of the Health and Safety Code.
- ❖ ***Further study*** measures are emission-reduction techniques that the District plans to investigate further before making a commitment to adopt them in our next triennial plan update and revision. Table 4-4 identifies the control measures for further study. Several of the listed measures have been found not to be cost-effective at this time, but they have been included as further study measures for possible future consideration.

### 4.2 EMISSION CONTROL MEASURE MANDATES

Under the California Clean Air Act, each air district that is nonattainment for the state ozone standards must demonstrate a five percent reduction in emissions per year or adopt every feasible measure available to that district.<sup>a</sup> The District has taken the approach of evaluating and adopting every feasible measure since the 1991 Air Quality Attainment Plan failed to produce the state mandated five percent per year emission reductions and was approved by the California Air Resources Board (ARB) under the every feasible measure option. [Appendix B summarizes the “every feasible measure” analyses” conducted for this triennial assessment.](#)

To ensure that the District has adopted or has proposed to adopt every feasible measure, staff did the following:

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<sup>a</sup> Health and Safety Code Section 40914(b).

1. Compared the District's rules to rules of other California air districts using ARB's document titled, "Identification of Performance Standards," April 1999, which evaluates emission control measures adopted throughout the state.
2. Reviewed and considered information provided in the California Air Pollution Control Officer Association document titled, "Potential All Feasible Measures," September 2003.
3. Considered the cost-effectiveness of the measures.

Furthermore, for proposed control measures (Table 4-2), if an analysis performed during the rulemaking process indicates that the cost-effectiveness of a measure is too high, the District will not move forward with adopting the new or revised rule.

The control measure requirements (e.g., ppm limits, grams/liter ROC-content limits) indicated in this Plan are subject to change when the actual rulemaking efforts are undertaken. The District is using the figures herein to develop emission reduction estimates required to be in the Plan by ARB and to give a general indication of today's limits necessary to comply with the "every feasible measure" mandate. However, there could be technological advancements between the time of adoption of this 2013 Clean Air Plan the time when the District begins to undertake the rulemaking effort, which would lower the emission limits or other limits used in this Plan. The rulemaking staff will consider such improvements in technology and lower emission limits or other limits found in other air district rules during the rule development process.

#### **4.3 EMISSION CONTROL MEASURES ADOPTED OR SCHEDULED FOR ADOPTION DURING THE REPORTING PERIOD (2010 TO 2012)**

Rulemaking activities during the 2010 to 2012 period focused on revisions to control measure N-XC-1 (Rule 352), R-SL-2 (Rule 321), R-SC-2 (Rules 330 and 337), R-SL-5 (Rule 349) and R-SL-9 (Rule 353). In addition to these control measures, several other rulemaking projects and mandates displaced staff from revising control measures originally scheduled in the 2010 Clean Air Plan. These included:

- ❖ Rule 334 (repealed)
- ❖ Rules 102 & 202 (amended to implement the California regulation on reducing greenhouse gases from semiconductor operations)
- ❖ Rule 901 (amended to update references to the New Source Performance Standards)
- ❖ Rules 102, 202, 370, 810, and 1301 (amended four rules and added new Rule 810 to implement EPA's federal Prevention of Significant Deterioration and Part 70 Greenhouse Gas Tailoring Rule)

The District has identified 1) the *expected* emission reductions that were in the 2010 Clean Air Plan and 2) the ~~current~~-revised emission reductions projections for each measure scheduled for adoption in the 2010 Clean Air Plan during the 2010 to 2012 reporting period.<sup>a</sup> This information is shown in Table 4-1. [Appendix C provides emission reduction summaries for the control measures shown in Table 4-1.](#)

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<sup>a</sup> Health and Safety Code Section 40924(b)(2) requires the District to provide this information.

**DATA FOR TABLE 4-1, EMISSION CONTROL MEASURES ADOPTED OR  
SCHEDULED FOR ADOPTION DURING THE REPORTING PERIOD (2010-2012)**

Rule	Control Measure ID	Description	Scheduled Rule Adoption Date	Actual Rule Adoption Date	Pollutant	Cost-Effectiveness (Dollars per Ton of Emissions Reduced)	2010 Clean Air Plan Expected Emission Reductions, Tons/Day (Tons/Year) <sup>a</sup>	Revised Emission Reductions, Tons/Day (Tons/Year)	
								2020	2030
321 (Revised)	R-SL-2	Solvent Cleaning Machines and Solvent Cleaning	2007 <sup>b</sup>	September 2010	ROC	-3,310 to 12,940	0.5261 (192.0187)	<del>0.4839</del> (176.6129) <u>0.4831</u> (176.3276)	<del>0.4795</del> (175.0225) <u>0.4787</u> (174.7398)
330 (Revised)	R-SC-2	Surface Coating of Metal Parts and Products (Revisions to Include Solvent Cleaning Requirements)	2010-2012	June 2012	ROC	-243 to 4,744	0.0212 (5.5146)	0.0222 (5.7769)	0.0220 (5.7249)
337 (Revised)	R-SC-2	Surface Coating of Aircraft or Aerospace Vehicle Parts and Products (Revisions to Include Solvent Cleaning Requirements)	2010-2012	June 2012	ROC	0	0.0006 (0.1482)	0	0
342 (Revised)	N-XC-4 and N-XC-5	Revisions to Reduce the NO <sub>x</sub> Limits to 15 ppmv at 3% Oxygen for Boilers, Steam Generators and Process Heaters Greater than or Equal to 5 MMBtu/hr	2010-2012	Not yet adopted	NO <sub>x</sub>	N/A <sup>c</sup>	0.0080 (2.9345)	N/A <sup>c</sup>	N/A <sup>c</sup>
349 (Revised)	R-SL-5	Polyester Resin Operations (Revisions to Include Solvent Cleaning Requirements)	2010-2012	June 2012	ROC	0	0.0058 (1.4964)	0 (0)	0 (0)
351 (Revised)	R-SC-5	Coating of Wood Products (Revisions to Include Solvent Cleaning Requirements)	2010-2012	Not yet adopted	ROC	477 to 909	0.0019 (0.6936)	0.0023 (0.6088)	0.0023 (0.6033)

<sup>a</sup> The figures shown are for planning year 2020.

<sup>b</sup> Delayed from the schedule shown in the 2007 Clean Air Plan.

<sup>c</sup> Not applicable because the control measure has been moved to the *further study* category.

**DATA FOR TABLE 4-1,**

**EMISSION CONTROL MEASURES ADOPTED OR SCHEDULED FOR ADOPTION DURING THE REPORTING PERIOD (2010-2012)**

Rule	Control Measure ID	Description	Scheduled Rule Adoption Date	Actual Rule Adoption Date	Pollutant	Cost-Effectiveness (Dollars per Ton of Emissions Reduced)	2010 Clean Air Plan Expected Emission Reductions, Tons/Day (Tons/Year) <sup>a</sup>	Revised Emission Reductions, Tons/Day (Tons/Year)	
								2020	2030
352 (Revised)	N-XC-1	Residential Water Heaters; Residential and Commercial Space Heaters (Revision Reduced the NOx Limits on the Residential Water Heaters to 15 ppmv)	2013-2015	October 2011	NOx	2,979 to 9,292	0.0660 (24.0743)	0.0967 <sup>b</sup> (35.2949) <sup>b</sup>	0.1406 (51.3036)
353 (Revised)	R-SL-9	Adhesives and Sealants	2010-2012	June 2012	ROC	-194 to 3,036	0.0050 (1.8246)	0.0029 (1.0421)	0.0028 (1.0328)
354 (Revised)	R-SL-7	Graphic Arts and Paper, Film Foil, and Fabric Coatings (Revisions to Rule 354 to Include Solvent Cleaning and Additional Requirements for Rotogravure, Flexographic, Lithographic, Letterpress, and Screen Printing)	2010-2012	Not yet adopted	ROC	1,002 to 3,130	0.0579 (21.1404)	0.0552 (20.1444)	0.0612 (22.3507)
Totals for ROC. <sup>c</sup>							0.6184 (222.6371)	<del>0.5665 (204.1852)</del> 0.5657 (203.8999)	<del>0.5679 (204.7341)</del> 0.5671 (204.4514)
Totals for NOx. <sup>c</sup>							0.0707 (25.8030)	0.0967 (35.2949)	0.1406 (51.3036)

<sup>a</sup> The figures shown are for planning year 2020.

<sup>b</sup> The Rule 352 figures are based on 80% rule implementation in planning year 2020.

<sup>c</sup> Totals may not appear to be correct due to rounding.



#### 4.4 PROPOSED AND CONTINGENCY EMISSION CONTROL MEASURES

The proposed control measures are summarized in Table 4-2. Each of the proposed measures in Table 4-2 were contained in prior Clean Air Plans, but have yet to be revised. These control measures are scheduled as either near-term (2013-2015) or mid-term (2016-2018).

**TABLE 4-2  
PROPOSED EMISSION CONTROL MEASURES**

Rule (Status)	Control Measure ID	Description	Adoption Schedule	Cost- Effectiveness (Dollars per Ton of Emissions Reduced)	Emission Reductions in Tons per Day (Tons per Year) from the Control Measure <sup>a</sup>	
					ROC	NO <sub>x</sub>
321 (Revised)	R-SL-2	Solvent Cleaning Machines and Solvent Cleaning (Revisions to Lower ROC-Content Limits).	2013 - 2015	<del>0</del> <u>2,784</u>	<del>0.0251</del> <del>(9.1575)</del> <u>0.3735</u> <u>(136.3448)</u>	—
323 (Revised)	R-SC-1	Architectural Coatings (Revisions to Include Solvent Cleaning Requirements and any New or Modified State Suggested Control Measure Provisions).	2013 - 2015	536 to 6,059	0.1296 (47.3009)	—
325, 326, 343, & 344 (Revised)	R-PP-1, R-PT-1, and R- PT-2	Crude Oil Production and Separation and Storage of Reactive Organic Compound Liquids; Petroleum Tank Degassing; and Petroleum Sumps, Pits and Well Cellars [Add Solvent Cleaning Provisions (e.g., Solvent with 25 grams of ROC per liter or less), <u>Solvent</u> Cleaning Machines Need to Comply with Rule 321, etc.].	2016 - 2018	606	<del>0.0128</del> <del>(4.6582)</del> <u>0.0090</u> <u>(3.2728)</u>	—
351 (Revised)	R-SC-5	Surface Preparation and Coating of Wood Products (Revisions to Include Solvent Cleaning Requirements and to Incorporate any New or Modified State Suggested Control Measure Provisions).	2013 - 2015	477 to 909	<del>0.0023</del> <u>0.0223</u> (0.6088)	—
354 (Revised)	R-SL-7	Graphic Arts and Paper, Film Foil, and Fabric Coatings (Revisions to Rule 354 to Include Solvent Cleaning and Additional Requirements for Rotogravure, Flexographic, Lithographic, Letterpress, and Screen Printing).	2016 - 2018	1,000 to 3,130	0.0552 (20.1444)	—
360 (Revised)	N-XC-2	Revisions to Reduce the NO <sub>x</sub> Limits to 20 ppmv at 3% Oxygen for Large Water Heaters and Small Boilers Rated 0.075 MMBtu/hr to 2 MMBtu/hr.	2013 - 2015	2,683 to 17,888	—	<del>0.0135</del> <u>0.0137</u> <sup>b</sup> <del>(4.9394)</del> <u>(5.0133)</u> <sup>b</sup>

<sup>a</sup> With the exception of Rule 360, the figures shown are for planning year 2020 with 100% rule implementation. The Rule 360 figure is for planning year 2030 with 70% rule implementation.

<sup>b</sup> Emission Reductions are for planning year 2030 with 70% rule implementation.

**TABLE 4-2**  
**PROPOSED EMISSION CONTROL MEASURES**

Rule (Status)	Control Measure ID	Description	Adoption Schedule	Cost- Effectiveness (Dollars per Ton of Emissions Reduced)	Emission Reductions in Tons per Day (Tons per Year) from the Control Measure <sup>a</sup>	
					ROC	NO <sub>x</sub>
Totals for ROC. <sup>b</sup>				—	<u>0.2250</u> <del>(81.8699)</del> <u>0.5696</u> <del>(207.6717)</del>	—
Totals for NO <sub>x</sub> . <sup>b</sup>				—	—	<u>0.0135</u> <del>(4.9394)</del> <u>0.0137</u> <del>(5.0133)</del>

[Appendix C provides emission reduction summaries for the control measures shown in Table 4-2.](#)

A contingency measure, as required by Health and Safety Code Section 40915, is shown in Table 4-3. The Enhanced Motor Vehicle Inspection and Maintenance program measure is carried over from the 2010 Plan.

**TABLE 4-3**  
**CONTINGENCY MEASURE**

Measure	Description
Motor Vehicle Inspection and Maintenance (T-21) <sup>c</sup>	Enhanced Motor Vehicle Inspection and Maintenance program. The overall cost effectiveness of the Enhanced I & M program is \$5,300 dollars per ton of hydrocarbon and NO <sub>x</sub> reduced (2004 dollars).

<sup>a</sup> With the exception of Rule 360, the figures shown are for planning year 2020 with 100% rule implementation. The Rule 360 figure is for planning year 2030 with 70% rule implementation.

<sup>b</sup> Totals may not appear to be correct due to rounding.

<sup>c</sup> This contingency measure was shown in the 2010 Clean Air Plan's chapter 5, Transportation Control Measures.

## 4.5 EMISSION CONTROL MEASURES FOR FURTHER STUDY

A possible new control measure and modifications to existing control measures that merit further study are shown in Table 4-4 (Further Study).

**TABLE 4-4  
FURTHER STUDY**

Rule	Control Measure ID	Description	Comments	Other Air District Rule that could be used as a model for a SBCAPCD Rule
—	—	Organic Material Composting Operations	The composting measure would limit emissions of reactive organic compounds from commercial composting operations.	San Joaquin Valley Unified APCD Rule 4566.
316	R-PM-2	Storage and Transfer of Gasoline - Gasoline Dispensing Phase I	Delete the Rule 316, Section I.2 exemption. Currently, this provision exempts agricultural operations from vapor recovery system requirements if more than 50 percent of the annual throughput is used to fuel implements of husbandry.	South Coast AQMD Rule 461.
342	N-XC-4 and N-XC-5	Boilers, Steam Generators and Process Heaters Greater than or Equal to 5 MMBtu/hr	Reduce the NO <sub>x</sub> Limit to 15 parts per million by volume at 3 percent oxygen or less.	South Coast AQMD Rule 1146 and San Joaquin Valley Unified APCD Rule 4306.
361	N-XC-4	Small Boilers, Steam Generators, and Process Heaters (Greater than 2 MMBtu/hr to Less than 5 MMBtu/hr)	Reduce the NO <sub>x</sub> Limit to 12 parts per million by volume at 3 percent oxygen or less.	South Coast AQMD Rule 1146.1 and San Joaquin Valley Unified APCD Rule 4307.

## 4.6 CONCLUSION

The Plan control measures include controls over a range of categories that contribute NO<sub>x</sub> and ROC emissions (e.g., water heaters and use of solvents, coatings, and inks). The control measures evaluated and identified in this chapter, combined with the emissions reductions expected from on-road mobile sources in *Chapter 5, Transportation Control Measures*, show that Santa Barbara County is making significant progress in reducing emissions from sources subject to our control.



## **5. TRANSPORTATION CONTROL MEASURES**

### **5.1 BACKGROUND**

In June 1993, the boards of the Santa Barbara County Association of Governments (SBCAG) and the Santa Barbara County Air Pollution Control District (District) jointly approved a Memorandum of Understanding (MOU), which effectively placed the responsibility for developing the transportation elements of the air quality plans with SBCAG. This MOU allows SBCAG to assist the District in a cooperative effort toward meeting the District's responsibilities for developing the transportation elements of its State and federal air quality plans. Under the MOU, SBCAG is responsible for the development and analysis of the 2013 Clean Air Plan's on-road mobile source emission estimates and Transportation Control Measures (TCMs). SBCAG also provides the District with socio-economic projections that form the basis for many of the stationary and area source growth forecasts for this Plan.

### **5.2 HISTORICAL TRENDS IN VEHICLE ACTIVITY**

#### **STATE ACT PERFORMANCE MEASURE**

State law requires areas classified as having a "moderate" non-attainment classification for the State 1-hour ozone standard, such as Santa Barbara County, to track and meet the following transportation performance standard: a substantial reduction in the rate of increase in passenger vehicle trips and vehicle miles traveled (VMT).<sup>a</sup> The California Air Resources Board (ARB) has defined "substantial reduction" as holding growth in VMT and trips to the same growth rate as population. Figure 5-1 shows annual growth rates for daily VMT and population for Santa Barbara County for the 21-year period between 1990 and 2011. Table 5-1 similarly shows average annual growth rates for population and VMT over the last three decades. As shown, the average annual VMT growth rate from 1990 to 1999 was 1.31 percent. The annual average population growth rate over this same period was 0.63 percent – below the comparable average annual rate of VMT growth. The trend over the last ten years has been a further decline in the VMT growth rate. For the period 2000 to 2010, the average annual VMT growth rate was 0.33 percent, compared to an average annual population growth rate for this same time period of 0.69 percent – higher than the comparable average annual rate of VMT growth. The ten-year growth rate ratios over the last three decades indicate that the VMT growth rate has decreased relative to the population growth rate.

### **5.3 TRANSPORTATION CONTROL MEASURES**

TCMs are programs or activities that states and localities can implement to encourage the traveling public to rely less on the automobile or to use the automobile more efficiently. TCMs reduce emissions from on-road motor vehicles and trucks by: improving the existing transportation system to allow motor vehicles to operate more efficiently; inducing people to change their travel behavior to less polluting modes; or, ensuring emission control technology improvements in the motor vehicle fleet are fully and expeditiously realized. TCMs address the need for the traveling public to carefully consider: 1) the implications of continued reliance on the single-occupant vehicle as the major choice of commute trips; 2) the need to provide and

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<sup>a</sup> California Health & Safety Code §40918(a)(3). VMT is considered a surrogate for vehicle trips for State performance standard monitoring.

promote alternatives to single-occupant vehicle travel; and, 3) the need to consider regulating those factors which promote single-occupant vehicle travel. While the greatest on-road mobile source emission reductions (over 95 percent) are attributable to motor vehicle emission controls established by federal and State laws and the natural attrition of older, more polluting vehicles (i.e., fleet turnover), TCMs should be considered as an integral part of air quality plans given that they help meet multiple objectives (e.g., congestion relief, energy efficiency, etc.).

Table 5-2 summarizes the implementation characteristics of all currently adopted TCM categories in the county. Identified are: the type of TCM; the adopting agency/agencies; the agency/agencies responsible for implementing the TCM; the formal agreements between the adopting and implementing agencies; and how TCM implementation will be monitored and by whom.

For State air quality planning purposes, control measures are classified as being adopted, proposed, contingency, further study, or deleted. Adopted TCMs are those projects and programs that the District has formally adopted and were developed as part of the 1994, 1998, 2001, 2004, 2007 and 2010 Plans. Where a district is in non-attainment with respect to a pollutant such as ozone, State law requires that District include “every feasible measure” should the district not achieve a 5 percent annual reduction in district-wide emissions. The adopted transportation control measures meet this statutory provision.

All TCMs evaluated as part of the last triennial update (2010 Plan) are listed below.

### **Currently Adopted**

- T-1 Trip Reduction Ordinance
- T-2 Employer-Based Transportation Demand Management (TDM) Programs
- T-3 Work Schedule Changes
- T-4 Area-wide Ridesharing Incentives
- T-5 Improve Commuter Public Transit Service
- T-6 High Occupancy Vehicle (HOV) Lanes
- T-7 Traffic Flow Improvements
- T-8 Parking Management
- T-10 Bicycle and Pedestrian Programs
- T-13 Accelerated Retirement of Vehicles
- T-17 Telecommunications
- T-18 Alternative Fuels
- T-19 Public Education
- T-20 Parking Management to Reduce Non-Commute Single Occupant Vehicle Use

### **Proposed For Further Study**

- T-9 Park-and-Ride Lots
- T-14 Activity Centers

### **Contingency Measure**

- T-21 Enhanced Inspection and Maintenance Program

There are no new TCMs proposed for adoption in the 2013 Clean Air Plan. The TCMs adopted in the prior Clean Air Plan (2010 Clean Air Plan) will form the basis for the 2013 Clean Air Plan's on-road mobile source control strategy. Table 5-3 lists new projects that have been implemented during the 2010 – 2013 reporting period.

Table 5-4 shows two measures proposed for further study. SBCAG staff will be working on a Park-and-Ride Lot Plan to determine the feasibility of adding additional capacity to existing lots or constructing new lots throughout the County. The results of this study will be incorporated into the next Clean Air Plan update.

The other measure proposed for further study, the Activity Centers measure, arose from Senate Bill 375, which was passed in 2008 by the California legislature. The EPA defines the Activity Centers TCM as “a program and/or ordinance to facilitate non-automobile travel or utilization of mass transit to reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to centers of vehicle activity.”<sup>a</sup> SB 375 places new regional planning responsibilities on Metropolitan Planning Organizations like SBCAG. This law is intended to help meet the State's greenhouse gas (GHG) emission reduction goals in AB 32 to reduce emissions from car and light-duty truck travel through regional transportation and land use strategies. SB 375 ties the regional housing and transportation planning and land use planning processes together by mandating the preparation of a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan.

SBCAG has prepared a draft 2040 RTP-SCS, which shows how the region will achieve the required GHG per capita emission targets as well the co-benefits of reducing criteria pollutants. The draft 2040 RTP-SCS is based on a preferred land use and transportation scenario, which lays out one possible pattern of future growth and transportation investment for the region. The RTP-SCS preferred scenario emphasizes a transit-oriented development and infill approach to land use and housing, supported by complementary transportation and transit investments. Population and job growth is allocated principally within existing urban areas near public transit. Allocation of future growth directly addresses jobs-housing balance issues by emphasizing job growth in the North County and housing growth in the South County.

The preferred scenario consists of three, core, inter-related components:

1. A land use plan, including residential densities and building intensities sufficient to accommodate projected population, household and employment growth;
2. A multi-modal transportation network to serve the region's transportation needs; and
3. A “regional greenprint” cataloguing open space, habitat, and farmland as constraints to urban development.

Overall, reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) emissions are forecast to continue to decline under both scenarios analyzed within the draft RTP-SCS (the “Future

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<sup>a</sup> Source: [http://www.epa.gov/oms/stateresources/policy/transp/tcms/activity\\_centers.pdf](http://www.epa.gov/oms/stateresources/policy/transp/tcms/activity_centers.pdf)

Baseline” scenario and the preferred growth scenario). The reductions primarily result from State and federal controls on light-duty vehicles and heavy-duty diesel emissions, as well as the natural attrition of older vehicles being replaced by newer vehicles (fleet turnover).

The draft RTP-SCS is currently scheduled for adoption in summer 2013. Therefore, the Activity Center measure is proposed for further study in the 2013 Clean Air Plan.

Also shown in Table 5-4 is the contingency measure for an Enhanced Inspection and Maintenance (I/M) Program.

**TABLE 5-1**  
**POPULATION AND VMT GROWTH RATES**

<b>TIME PERIOD</b>	<b>ANNUAL AVG. GROWTH RATE - POPULATION</b>	<b>ANNUAL AVG. GROWTH RATE - VMT</b>	<b>ANNUAL AVG. GROWTH RATIO (POP : VMT)</b>
1981-1989	1.98%	4.58%	1:2.31
1990-1999	0.63%	1.31%	1:2.08
2000-2010	0.69%	0.33%	1:0.49



**TABLE 5-2**  
**SANTA BARBARA COUNTY TRANSPORTATION CONTROL MEASURES**

<b>TCM</b>	<b>TCM DESIGNATION</b>	<b>TYPE OF TCM</b>	<b>ADOPTING AGENCY(IES)</b>	<b>IMPLEMENTING AGENCY(IES)</b>	<b>COMMITMENTS</b>	<b>MONITORING MECHANISM (AGENCY)</b>
T-1  T-2	Trip Reduction Program  Employer-Based TDM Program	Voluntary;  TDM Program;  State AQAP	Tier 1: Guadalupe; Buellton; Solvang; County, SYV  Tier 2: Lompoc; Santa Maria; Carpinteria; County Unincorporated  Tier 3: Santa Barbara; County, Goleta	Tier 1 (County/ Cities)  Tier 2 (County/Cities)  Tier 3 (County/Cities)	Tiers 1 & 2: Resolution of Commitments from Affected Jurisdictions;  Tier 3: City and County TDM Program City of Santa Barbara and Goleta area	Transportation Demand Management Program (SBCAG)  Congestion Mitigation Program Conformity (SBCAG)
T-3	Work Schedule Changes	Voluntary	County and Cities	County and Cities; Private Sector	Adopted Policy, County, 1988	Not Applicable (TDM)
T-4	Area Wide Ridesharing	Voluntary	County and Cities	SBCAG	Interagency Agreement	TDM Program (SBCAG)
T-5	Public Transportation	Programmed	County and Cities	SBMTD; SMAT; SBCAG; District; COLT; SYVT	FTIP and RTIP; SRTP, TDP	RTP List of Programmed Projects (SBCAG)
T-6	High Occupancy Vehicle Lanes	Programmed	Caltrans and SBCAG	Caltrans and SBCAG	FTIP and RTIP; Measure A Strategic Plan	RTP List of Programmed Projects (SBCAG)
T-7	Traffic Flow Improvement	Programmed	County and Cities	County and Cities; Caltrans; SBMTD; SBCAG	FTIP and RTIP	RTP List of Programmed Projects (SBCAG)
T-8	Parking Management	Parking Ordinance	City of Santa Barbara	City of Santa Barbara	Not Applicable	City of Santa Barbara Parking Task Force
T-9	Park-and-Ride Fringe Parking	Voluntary; Programmed	County and Cities	County and Cities; Caltrans	FTIP and RTIP	Caltrans, District 5; RTP List of Programmed Projects (SBCAG)
T-10	Bicycle/Pedestrian	Programmed	County and Cities	County and Cities; Caltrans; SBCAG	FTIP and RTIP; General Bikeway Elements; Bikeway Master Plans	RTP List of Programmed Projects (SBCAG)
T-13	Accelerated Retirement of Vehicles	Voluntary	District	District	Contract District/Engineering	District
T-17	Telecommunication	Voluntary	County and Cities	County and Cities; Private Sector	Not Applicable	Not Applicable (TDM)
T-18	Alternative Fuel Program	Voluntary	District	District; County and Cities	Interagency Agreements Unnecessary	District
T-19	Public Education	Committal; Voluntary	County and Cities District; SBCAG	County and Cities District; SBCAG	Interagency Agreements Unnecessary	Not Applicable; CMP Conformance (SBCAG)

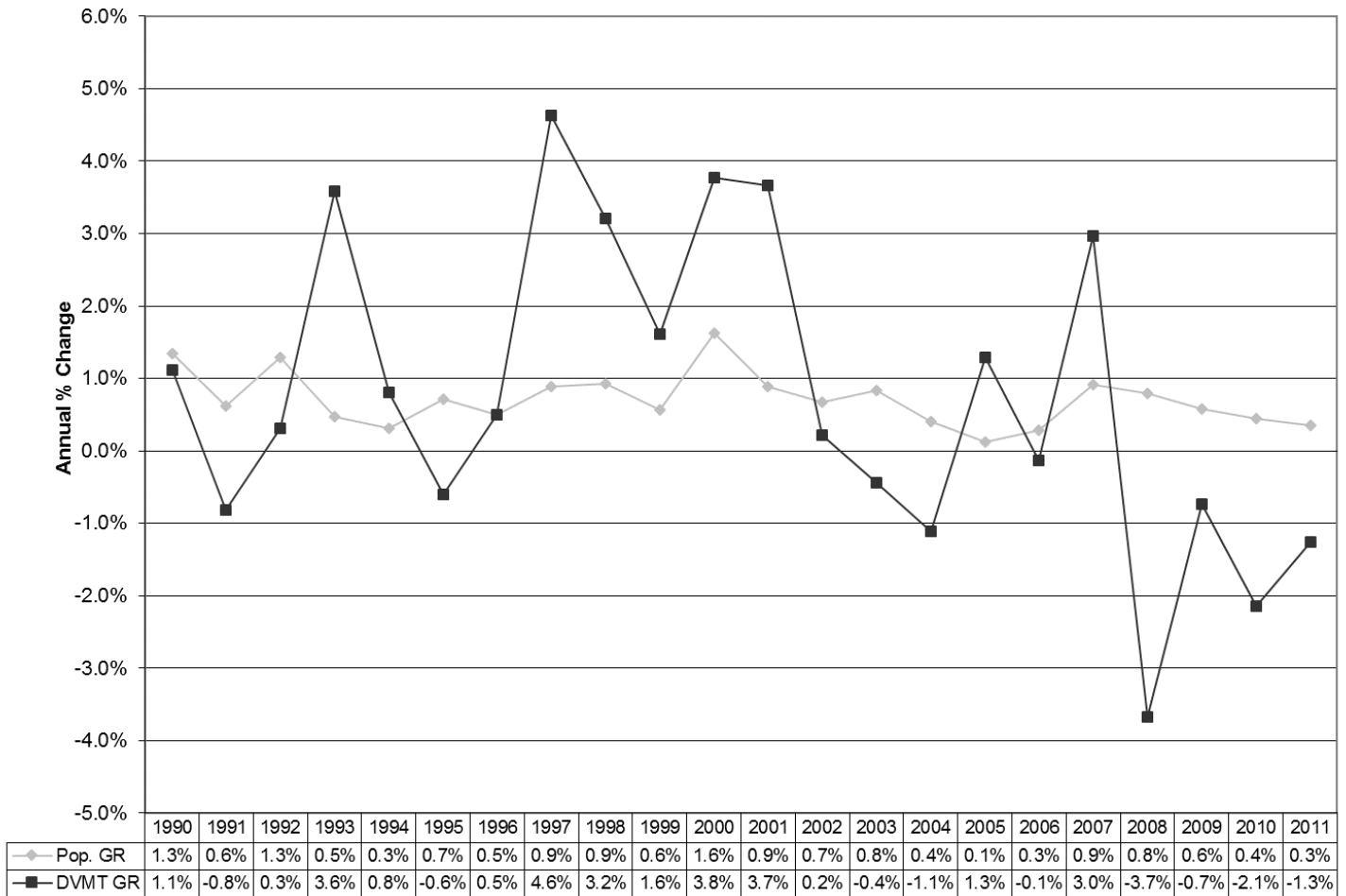
**TABLE 5-3**  
**PROJECTS ADDED TO SUPPLEMENT PREVIOUSLY ADOPTED TRANSPORTATION CONTROL MEASURES**

TCM	DESIGNATION	PROJECT SPONSOR	PROJECT
4	Area-wide Ridesharing	Traffic Solutions / SBCAG	CalVans monthly subsidy (up to 50%) for newly formed vanpools. Vans added as needed.
5	Public Transportation	MTD / SBCAG	Breeze Route 200: Weekday A.M., mid-day, and evening transit service between Santa Maria, Los Alamos, and Santa Ynez
		SMAT / COLT / SYVT / County	Coastal Express Limited
10	Bicycle	City of Lompoc	Allan Hancock Bikeway: Class I bike path from H Street-Highway 1 to Allan Hancock College

**TABLE 5-4**  
**TRANSPORTATION CONTROL MEASURES PROPOSED FOR FURTHER STUDY AND CONTINGENCY MEASURES**

TCM	DESIGNATION	PROJECT SPONSOR	PROJECT/PROGRAM DESCRIPTION	PROCESS
<b>Proposed for Further Study</b>				
9	Park-n-Ride Lots	Caltrans/SBCAG	Countywide, Southern SLO County and Western Ventura County. Study currently underway by SBCAG staff.	SBCAG Overall Work Program
14	Activity Centers	SBCAG/ Transit Agencies/ Local Jurisdictions	The upcoming Sustainable Communities Strategies (mandated by SB 375) will look at potential transit oriented development sites. The SCS will include an analysis of potential co-benefits of criteria pollutant reduction with various SCS strategies.	SBCAG Regional Transportation Plan
<b>Contingency Measure</b>				
21	Inspection and Maintenance	Bureau of Automotive Repair	Enhanced I/M Program	Pending

**FIGURE 5-1**  
**HISTORICAL POPULATION GROWTH RATE VS. DAILY VEHICLE MILES TRAVELED (DVMT)**  
**GROWTH RATE (1990 – 2011)**





## **APPENDICES**

**Appendix A:** Bases for Cost Effectiveness Data in the 2013 Clean Air Plan

**Appendix B:** “Every Feasible Measure” Analyses

**Appendix C:** Emission Reduction Summaries for Control Measures Listed in Tables 4-1 and 4-2

**Appendix D:** Public Participation



## Appendix A - Bases for Cost Effectiveness Data in the 2013 Clean Air Plan

Rule	Description	Cost-Effectiveness (Dollars per Ton of Emissions Reduced)	Basis
321 (Revised in 2010)	Solvent Cleaning Machines and Solvent Cleaning	-3,310 to 12,940	Based on information in the San Joaquin Valley Unified Air Pollution Control District, Final Staff Report - Amendments to Rule 4662 (Organic Solvent Degreasing Operations), May 11, 2001.
321 (Future Revision)	Solvent Cleaning Machines and Solvent Cleaning (Revisions to Lower ROC-Content Limits).	2,784	<p>In the SC Rule 1171 Sept. 27, 1999 staff report, the cost effectiveness information for <b>product cleaning during manufacturing process or surface preparation for coating, adhesive, or ink application</b> indicates: There is no expected cost increase for the proposed VOC reduction in this category due to minimal material substitution to lower VOC content.</p> <p>However, this same staff report indicates for <b>cleaning of coating or adhesive application equipment</b> that the cost effectiveness is \$2,784 per ton of ROC emissions reduced. Since one of the substantial changes to PAR 321 is to reduce the application equipment clearing ROC content limit from 950 to 25 g/l, the District is using the \$2,784 per ton figure for the cost effectiveness data.</p>
323 (Future Revision)	Architectural Coatings (Revisions to Include Solvent Cleaning Requirements and any New or Modified State Suggested Control Measure Provisions).	536 to 6,059	Info is from the SJV Aug. 16, 2007 staff report for amending solvent cleaning portions of 11 rules.
325, 326, 343, & 344 (Future Revision)	Crude Oil Production and Separation and Storage of Reactive Organic Compound Liquids; Petroleum Tank Degassing; and Petroleum Sumps, Pits and Well Cellars (Add Solvent Cleaning Provisions (e.g., Solvent with 25 grams of ROC per liter or less, Cleaning Machines Need to	606	Assumed only the solvent cleaning machine solvent will need to be replaced with aqueous or low-ROC solvent. That is, there will be essentially no change to the solvent cleaning operations. For the solvent cleaning machine solvent cost increase, staff assumed the replacement solvent will cost \$1 more than the current solvent and that usage will be increased by 50 percent. That is, the ratio of low-ROC solvent to petroleum-based solvent is 1.5 to 1.
330 (Revised in 2012)	Surface Coating of Metal Parts and Products (Revisions to Include Solvent Cleaning Requirements) <sup>a</sup>	-241 to 4,744	Four scenarios were considered: 100% switch to aqueous solvent, 20/80 switch to acetone/aqueous, 100 switch to acetone, and, for gun cleaning, use of an enclosed gun washer. Similar to the approach used in SJV.

## Appendix A - Bases for Cost Effectiveness Data in the 2013 Clean Air Plan

Rule	Description	Cost-Effectiveness (Dollars per Ton of Emissions Reduced)	Basis
337 (Revised in 2012)	Surface Coating of Aircraft or Aerospace Vehicle Parts and Products (Revisions to Include Solvent Cleaning Requirements)	0	No emission reductions.
349 (Revised in 2012)	Polyester Resin Operations (Revisions to Include Solvent Cleaning Requirements)	-4,145 to 1,888	Four scenarios were considered: 100% switch to aqueous solvent, 20/80 switch to acetone/aqueous, 100 switch to acetone, and, for gun cleaning, use of an enclosed gun washer. Similar to the approach used in SJV.
351 (Future Revision)	Surface Preparation and Coating of Wood Products (Revisions to Include Solvent Cleaning Requirements and to Incorporate any New or Modified State Suggested Control Measure Provisions).	477 to 909	Similar to the VC Rule 74.30 April 20, 2006 C/E approach. Two scenarios were considered: replacement of solvent with acetone (\$2/gallon cost difference) and replacement of solvent with a low-ROC solvent (\$1/gallon cost difference). Also, included a low-ROC or no-ROC solvent to petroleum-based solvent ratio of 1.5 to 1.
352 (Revised in 2011)	Residential Water Heaters; Residential and Commercial Space Heaters (Revision Reduced the NOx Limits on the Residential Water Heaters to 15 ppmv)	2,979 to 9,292	SC AQMD Rule 1121 staff report dated September 2004.
353 (Revised in 2012)	Adhesives and Sealants	-194 to 3,036	Four scenarios were considered: 100% switch to aqueous solvent, 20/80 switch to acetone/aqueous, 100 switch to acetone, and, for gun cleaning, use of an enclosed gun washer. Similar to the approach used in SJV.
354 (Future Revision)	Graphic Arts and Paper, Film Foil, and Fabric Coatings (Revisions to Rule 354 to Include Solvent Cleaning and Additional Requirements for Rotogravure, Flexographic, Lithographic, Letterpress, and Screen Printing)	1,002 to 3,130	Three EPA Control Techniques Guideline documents:  1. Offset Lithographic Printing and Letterpress Printing, Sept. 2006, EPA-453/R-06-002. 2. Flexible Package Printing, Sept. 2006, EPA 453/R-06-003. 3. Paper, Film, and Foil Coatings, Sept. 2007, EPA 453/R-07-003.



Appendix A - Bases for Cost Effectiveness Data in the 2013 Clean Air Plan

<b>Rule</b>	<b>Description</b>	<b>Cost-Effectiveness (Dollars per Ton of Emissions Reduced)</b>	<b>Basis</b>
360 (Future Revision)	Revisions to Reduce the NO <sub>x</sub> Limits to 20 ppmv at 3% Oxygen for Large Water Heaters and Small Boilers Rated 0.075 MMBtu/hr to 2 MMBtu/hr.	2,683 to 17,888	SC AQMD Rule 1146.2.



## Appendix B - “Every Feasible Measure” Analyses

Control Measure, Rule (If Any), and Summary of “Every Feasible Measure” Analysis	Include in Every Feasible Measure List?
<b>R-SL-2; Rule 321, Solvent Cleaning Machines and Solvent Cleaning</b> Rule 321 solvent limits were last amended on September 20, 2010. With a <b>general solvent</b> reactive organic compound limit of 50 grams per liter, this rule is not as stringent as those found in other air districts. The <b>general solvent</b> reactive organic compound content is limited to 25 grams per liter in the San Joaquin Valley Unified APCD (Rules 4662 and 4663) and in the Ventura County APCD (Rules 74.6 and 74.6.1). Hence, the District plans to amend Rule 321 to lower the solvent’s reactive organic compound limits,	Yes
<b>R-SC-1, Rule 323, Architectural Coatings; Control of Oxides of Nitrogen (NOx) from Boilers, Steam Generators and Process Heaters</b> The last time the District amended Rule 323 was to include the June 2000 Suggested Control Measure provisions. Now, revisions to Rule 323 are needed for two reasons: 1) to incorporate the October 2007 Suggested Control Measure provisions, and 2) to add solvent cleaning requirements. Similar to Rule 321, the District needs to limit the solvent reactive organic compound content to 25 grams per liter. This limit is consistent with the South Coast AQMD Rule 1171 limit.	Yes
<b>R-PP-1, R-PT-1, and R-PT-2; Rules 325, 326, 343, &amp; 344; Crude Oil Production and Separation, Storage of Reactive Organic Compound Liquids, Petroleum Storage Tank Degassing, and Petroleum Sumps, Pits and Well Cellars</b> These petroleum rules currently have no provisions on solvent cleaning machines or solvent cleaning. The District plans to add such requirements to each of these rules. The solvent cleaning provision will be similar to the San Joaquin Valley Unified APCD Rule 4623 §5.7.5.5.1 requirement. <sup>a</sup>	Yes
<b>N-XC-4 and N-XC-5; Rule 342, Control of Oxides of Nitrogen (NOx) from Boilers, Steam Generators and Process Heaters</b> Rule 342 applies to external combustion equipment having input ratings of 5 million British thermal units per hour and greater. In 2012, the District studied reducing the Rule 342 nitrogen oxides limit to 15 parts per million, by volume, at 3 percent oxygen. The study indicated that the cost-effectiveness of such an amendment would be \$471,612 per ton. This was determined not cost effective based on the range of costs for past District-adopted rules. The proposed revision to Rule 342 is considered infeasible.	No

<sup>a</sup> The provisions will likely indicate: 1) While performing solvent cleaning, operators may use the following cleaning agents: diesel fuel, solvents with an initial boiling point of greater than 302 degrees Fahrenheit, solvents with a vapor pressure of less than 0.5 pounds per square inch actual, or solvents with 25 grams per liter reactive organic compound content or less, and 2) Any person who owns, operates, or uses any solvent cleaning machine shall comply with the applicable provisions of Rule 321, Solvent Cleaning Machines and Solvent Cleaning.

## Appendix B - “Every Feasible Measure” Analyses

Control Measure, Rule (If Any), and Summary of “Every Feasible Measure” Analysis	Include in Every Feasible Measure List?
<p><b>R-SC-5; Rule 351, Surface Preparation and Coating of Wood Products</b>            Rule 351 currently has minimal solvent cleaning requirements (e.g., keep containers closed when not in use). Hence, this rule’s solvent cleaning requirements are not as stringent as those found in other air district rules. The District plans to amend Rule 351 to include solvent cleaning requirements modeled on those found in the San Joaquin Valley Unified APCD Rule 4606 and/or the Ventura County APCD Rule 74.30. In general, the solvent reactive organic compound limit will be reduced to 25 grams per liter and any solvent cleaning machine used at the facility will need to comply with Rule 321.</p>	<b>Yes</b>
<p><b>R-SL-7; Rule 354, Graphic Arts and Paper, Film Foil, and Fabric Coatings</b>            Presently Rule 354 applies to two types of graphic art printing operations: rotogravure and flexographic printing processes. And sources performing these printing processes emitting less than 301 pounds per month of reactive organic compound emissions are exempt from the rule’s ROC content limits for inks, coatings, adhesives, and solvents. In addition, many of the rule’s ROC content limits are higher than those found in other air districts. Hence, Rule 354 is not as stringent as those found in other air districts. The District plans to model the revised Rule 354 on those found in the South Coast AQMD (Rules 1171, 1130, and 1130.1), the San Joaquin Valley Unified APCD (Rule 4607), and the Ventura County APCD (Rules 74.3, 74.19, and 74.19.1). The scope of the graphic art rules in these districts include: gravure, letterpress, flexographic, lithographic, and screen printing operations.</p>	<b>Yes</b>
<p><b>N-XC-2; Rule 360, Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers</b>            Rule 360 applies to water heaters, boilers, steam generators, and process heaters with rated heat input capacities ranging from 0.075 million British thermal units per hour to 2 million British thermal units per hour. Other air district rules that apply to these types of external combustion units limit the nitrogen oxides emissions to 20 parts per million, by volume, at 3 percent oxygen. This limit is less than the Rule 360 limits; therefore, the Rule 360 is not as stringent as those found in other air districts. The District plans to model the revised Rule 360 on those found in the South Coast AQMD (Rule 1146.2), the San Joaquin Valley Unified APCD (Rule 4308), and/or the Ventura County APCD (Rules 74.11.1 and 74.15.1).</p>	<b>Yes</b>
<p><b>N-SC-4; Rule 361, Small Boilers, Steam Generators, and Process Heaters</b>            Rule 361 applies to external combustion equipment with rated heat input capacities ranging from 2.0001 million British thermal units per hour to 4.9999 million British thermal units per hour. In 2012, the District studied reducing the Rule 361 nitrogen oxides limit to 12 parts per million, by volume, at 3 percent oxygen. The study indicated that the cost-effectiveness of such an amendment would be \$32,081 per ton. This was determined not cost effective based on the range of costs for past District-adopted rules. The proposed revision to Rule 361 is considered infeasible.</p>	<b>No</b>

## Appendix C - Emission Reduction Summaries for Control Measures Listed in Tables 4-1 and 4-2

### Emission Reduction Summary for Rule 321 as Adopted in 2010 (reference Table 4-1):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	2.2888 (835.3969)	2.1367 (779.9039)	2.1177 (772.9673)
Projected Emission Reductions	0.5179 (189.0305)	0.4831 (176.3276)	0.4787 (174.7398)
Projected Emissions After Control	1.7709 (646.3665)	1.6536 (603.5763)	1.6390 (598.2275)

### Emission Reduction Summary for Rule 321 as Scheduled for Adoption in 2013-2015 (reference Table 4-2):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	1.7709 (646.3665)	1.6536 (603.5763)	1.6390 (598.2275)
Projected Emission Reductions	0.4005 (146.1672)	0.3735 (136.3448)	0.3702 (135.1170)
Projected Emissions After Control	1.3704 (500.1992)	1.2801 (467.2315)	1.2688 (463.1105)

### Emission Reduction Summary for Rule 330 as Adopted in 2012 (reference Table 4-1):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.0736 (19.1321)	0.0686 (17.8464)	0.0680 (17.6857)
Projected Emission Reductions	0.0238 (6.1931)	0.0222 (5.7769)	0.0220 (5.7249)
Projected Emissions After Control	0.0498 (12.9390)	0.0464 (12.0695)	0.0460 (11.9608)

### Emission Reduction Summary for Rule 351 Scheduled for Adoption in 2010-2012 (reference Table 4-1) and Scheduled for Adoption in 2013-2015 (reference Table 4-2):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.0621 (16.1489)	0.0579 (15.0637)	0.0574 (14.9281)
Projected Emission Reductions	0.0025 (0.6527)	0.0223 (0.6088)	0.0223 (0.6033)
Projected Emissions After Control	0.0596 (15.4962)	0.0556 (14.4549)	0.0551 (14.3247)

## Appendix C - Emission Reduction Summaries for Control Measures Listed in Tables 4-1 and 4-2

### Emission Reduction Summary for Rule 352 as Adopted in 2011 (reference Table 4-1):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.4860 (177.3771)	0.4856 (177.2351)	0.5479 199.9886
Projected Emission Reductions	0.1413 (51.5780)	0.0967 (35.2949)	0.1406 (51.3036)
Projected Emissions After Control	0.3447 (125.7992)	0.3889 (141.9402)	0.4074 (148.6850)

### Emission Reduction Summary for Rule 353 as Adopted in 2012 (reference Table 4-1):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.8247 (301.0209)	0.7693 (280.7923)	0.7624 (278.2637)
Projected Emission Reductions	0.0031 (1.1172)	0.0029 (1.0421)	0.0028 (1.0328)
Projected Emissions After Control	0.8217 (299.9037)	0.7664 (279.7502)	0.7595 (277.2310)

### Emission Reduction Summary for Rule 354 Scheduled for Adoption in 2010-2012 (reference Table 4-1) and Scheduled for Adoption in 2016-2018 (reference Table 4-2):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.4812 (175.6468)	0.5135 (187.4137)	0.5699 (208.0183)
Projected Emission Reductions	0.0515 (18.8024)	0.0552 (20.1444)	0.0612 (22.3507)
Projected Emissions After Control	0.4297 (156.8444)	0.4583 (167.2693)	0.5087 (185.6676)

### Emission Reduction Summary for Rule 323 as Scheduled for Adoption in 2013-2015 (reference Table 4-2):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.1600 (58.4000)	0.1710 (62.4121)	0.1929 (70.4246)
Projected Emission Reductions	0.1213 (44.2602)	0.1296 (47.3009)	0.1462 (53.3734)
Projected Emissions After Control	0.0387 (14.1398)	0.0414 (15.1112)	0.0467 (17.0512)

Appendix C - Emission Reduction Summaries for Control Measures Listed in Tables 4-1 and 4-2

Emission Reduction Summary for Rules 325, 326, 343, & 344 as Scheduled for Adoption in 2016-2018 (reference Table 4-2):

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.0263 (9.6080)	0.0263 (9.6080)	0.0263 (9.6080)
Projected Emission Reductions	0.0090 (3.2728)	0.0090 (3.2728)	0.0090 (3.2728)
Projected Emissions After Control	0.0174 (6.3352)	0.0174 (6.3352)	0.0174 (6.3352)

Emission Reduction Summary for Rule 360 as Scheduled for Adoption in 2013-2015 (reference Table 4-2):<sup>a</sup>

<b>ROC Planning Emission Inventory</b>	<b>2008, Tons/Day (Tons/Year)</b>	<b>2020, Tons/Day (Tons/Year)</b>	<b>2030, Tons/Day (Tons/Year)</b>
Projected Emissions Before Control	0.1492 (54.4432)	0.1316 (48.0355)	0.1298 (47.3813)
Projected Emission Reductions	0.0165 (6.0248)	0.0037 (1.3435)	0.0137 (5.0133)
Projected Emissions After Control	0.1327 (48.4184)	0.1279 (46.6920)	0.1161 (42.3680)

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<sup>a</sup> The 2008 figure is for 100% rule implementation. The 2020 figure assumes 20% rule implementation and the 2030 figure assumes 70% rule implementation.





## Appendix D – Public Participation

### COMMUNITY ADVISORY COUNCIL MEETINGS

<b>Meeting Date</b>	<b>Item(s) Presented</b>
October 10, 2012	General briefing on the elements required for the state Clean Air Plan triennial update, a summary on each of the components required, and the Plan's schedule.
December 12, 2012	Preliminary Data for Tables 4-1 and 4-2, emission reductions and cost effectiveness and the procedures for determining emission reductions and cost effectiveness.
February 13, 2013	Chapter 4 (Emission Control Measures).
March 13, 2013	Chapter 1 (Introduction) , Chapter 2 (Local Air Quality), and Chapter 3 (Emission Inventory)
May 8, 2013	Chapters 1 - 4 in strikeout and underline formatting; Chapter 5 (Transportation Control Measures)

### RESPONSE TO PUBLIC COMMENTS (PLACEHOLDER)

