

## MEMORANDUM

**TO:** Brian Shafritz, TEA Division Manager

**FROM:** Molly Pearson, Planning & Grants Supervisor

**DATE:** November 25, 2014

**SUBJECT:** Environmental Review for the 2013 Clean Air Plan, including ***Addendum to the 2010 Clean Air Plan EIR***

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### 1.0 BACKGROUND

The 2013 Clean Air Plan (Plan) is the sixth triennial update to the initial State Clean Air Plan adopted by the Santa Barbara County Air 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 pollutants [nitrogen oxides (NO<sub>x</sub>), and reactive organic compounds (ROC)]. 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. The County has yet to attain the state 8-hour ozone standard.

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

The 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<sub>x</sub> emissions 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), and the potential adoption of all of the control measures proposed for adoption. The 2010 Plan EIR describes the new information and control techniques, and associated environmental impacts. As documented in the 2010 Plan EIR, no significant environmental impacts were anticipated to occur as a result of Plan implementation.

The 2010 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 2013 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, calling for the preparation of a subsequent 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 Plan EIR.

### **3.0 DIFFERENCES BETWEEN THE 2010 CLEAN AIR PLAN AND THE 2013 CLEAN AIR PLAN**

The 2013 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.

#### CHANGES TO CLASSIFICATION OF STATIONARY SOURCE CONTROL MEASURES

In Chapter 4 of the 2013 Plan we propose to carry forward the proposed control measures from the 2010 Plan that are pending rule adoption, with the exception of the following two stationary source control measures that have been reclassified from “proposed for adoption” to “further study” measures:

- Rule 342 - Control of Oxides of Nitrogen (NOX) from Boilers, Steam Generators and Process Heaters
- Rule 361 - Small Boilers, Steam Generators, and Process Heaters

These two control measures were previously proposed for adoption in the 2010 Plan, were analyzed in the 2010 Plan EIR, and no environmental impacts were identified for implementation of these control measures (Final EIR for the 2010 Clean Air Plan, Page ES-3, State Clearinghouse #2010071014). Re-classification of the measures to “further study” measures means that they are not planned to be implemented during the 2013 Plan cycle. Instead, the District plans to investigate the measures further before making a commitment to adopt them in the next triennial plan update.

Also, Chapter 4 of the 2013 Plan has been revised to reflect that Rule 323.1 was adopted and implements control measure R-SC-1.

These changes to the classification of control measures are not anticipated to result in environmental impacts.

#### TRANSPORTATION CONTROL MEASURES

Chapter 5 of the 2013 Plan also includes a change from “further study” to “proposed for adoption” for

two transportation control measures (TCM T-9, Park-and-Ride (enhanced) and TCM T-14, Activity Centers). These TCMs are proposed for adoption because they have already been implemented by SBCAG and the concepts behind these TCMs are included in the adopted RTP/SCS<sup>a</sup>. These TCMs identify programs or activities that states and localities can undertake. In adopting these TCMs and including them in the 2013 Plan, the District is not approving the specific projects that implement the TCMs. Future discretionary projects that implement these TCM concepts will be subject to environmental review under CEQA as part of the CEQA lead agency approval process. No impacts are anticipated to result from adoption of TCMs T-9 and T-14.

#### **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 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 2013 Plan will not result in significant new environmental impacts, as compared to the project that was analyzed in the 2010 Plan EIR. No new mitigation measures are required.

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<sup>a</sup> Santa Barbara County Association of Governments, *Final 2040 Regional Transportation Plan & Sustainable Communities Strategy*, Adopted August 15, 2013.