Summary of CAC Comments and Responses

Items discussed at the June 8, 2016 Community Advisory Council (CAC) meeting

Following is a summary of items that were brought up at the June 8 CAC meeting, and revisions that were made to the document as a result of the discussion.

<u>Comment #1</u>: Request to show previous state 1-hr and 8-hr ozone standards on Figures 2-1 and 2-2.

<u>Response/revisions</u>: The state 1-hr ozone standard was set at 0.09 ppm in 1988 and has not been changed. In 2005, a new 8-hour standard was set at 0.070 ppm. Language was added to Chapter 1 to clarify this, and a table was also added in Chapter 1 to show all of the standards and their adoption dates.

<u>Comment #2</u>: Request to show the trend line for population overlaid on the "expected peak day concentrations" (EPDC) graphs in Figures 2-1 and 2-2.

<u>Response/revisions</u>: The suggestion to overlay air quality trends with population trends is a good one; however, Figures 2-1 and 2-2 include a large amount of information. In order to address this request, the population data was added onto Figure 2-3 instead, as this will still show population trends as they compare to air quality trends.

<u>Comment #3</u>: Can we use a more recent base year than 2012? Is the 2012 inventory a higher number that then justifies more control measures?

Response/revisions: District staff initially discussed the possibility of using 2013 as a base year for the 2016 Ozone Plan with ARB. However, because ARB has compiled the base year 2012 inventory for inclusion in their 2016 State Implementation Plan (SIP) submittal to the EPA, the 2012 inventory is the most complete and accurate inventory for all of the source categories. In deciding to use the 2012 inventory for the base year, District staff considered whether there were any over-arching changes in the economy, technology, or regulations that would make 2012 an inappropriate choice as a base year; none were identified. Staff also examined whether the use of a 2013 or a 2014 year inventory would affect any of the proposed control strategies in the 2016 Ozone Plan, and concluded that there would be no change to the proposed control strategies. Additional language has been added to the discussion of the base year selection in Chapter 3.

<u>Comment #4</u>: What is the basis for the growth factor of 1.0 for the oil and gas sector? What data is being used to support this assumption? One CAC member suggested that we look at new projects coming in as a basis for a growth factor. Another CAC member suggested that we explain the basis for the other growth factors (non-oil and gas).

<u>Response/revisions</u>: District staff performed additional analysis of the data in Figure 3-2 and generated a revised Figure 3-2 that is more representative of the trends in emissions vs. oil production. As part of the analysis, emission trends were also examined separately for onshore vs. offshore oil production. Revised Figure 3-2 demonstrates that although onshore and offshore

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oil production may increase and decrease over time, the emissions trends have been fairly constant. Clarification and revisions were also made to the text and to Table 3-1.

<u>Comment #5</u>: A few CAC members brought up concerns about commuter and truck traffic on the 101 that may not originate from, or have a destination in, Santa Barbara County (i.e., pass-through, interregional traffic). Can we separate out local traffic from interregional (pass-through) traffic, which we have no control over?

<u>Response/revisions</u>: SBCAG has provided information on SB County VMT vs. interregional VMT. The data will be discussed at the upcoming CAC meeting.

<u>Comment #6</u>: In reference to the statement on Page 5-1, "ARB has defined 'substantial reduction' as holding growth rate in VMT to the same growth rate as population," a CAC member asked, how do you hold VMT growth to less than population growth?

<u>Response/revisions</u>: SBCAG staff replied that the concept of holding VMT growth to the same or less than population growth is more of a performance measure than a goal. The language in Chapter 5 has been revised to more clearly portray that the comparison of VMT growth to population growth is a performance measure.

<u>Comment #7</u>: A CAC member asked for clarification regarding the transportation control measures (TCMs) that are proposed in the plan. Are any TCMs being proposed for adoption?

Response/revisions: SBCAG staff clarified that there are no new TCMs being proposed at this time; however, all of the adopted TCMs continue to be implemented. Table 5-4 highlights ongoing activities and programs that are currently being implemented under the existing, adopted TCMs. Additional language was added to the "Implementation Activities for TCMs" section to clarify that TCMs are continually implemented through regional and local programs and projects. A section titled "TCMs Proposed for Adoption" was added to Chapter 5, and indicates that although no new TCMs are proposed, numerous TCMs will continue to be implemented through existing and future programs and projects.

<u>Comment #8</u>: CAC members asked which agency has the authority to mandate vessel speed reduction, and requested that this information be included in the plan.

<u>Response/revisions</u>: Mandatory vessel speed reduction has been implemented on the east coast by NOAA/National Marine Fisheries Service for North Atlantic Right Whale protection. We are not aware of any agencies that are considering mandatory VSR on the west coast at this time. A discussion of mandatory VSR would be outside of the scope of the 2016 Ozone Plan.

<u>Comment #9</u>: Regarding the section in Chapter 5 on "Strategies to Reduce Emissions from Marine Shipping," one CAC member requested that we add the monetary incentive amount of \$2,500 per one-way transit to the description of the 2014 VSR trial incentive program. Another

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CAC member asked for a description of the baseline vessel speeds as compared to the reducedspeed transits, and change in transit times as a result of speed reductions.

<u>Response/revisions</u>: Information on the monetary incentive amount, baseline vessel speeds, and change in transit times were added to this section.

Other corrections/revisions

Other corrections and revisions were made to the text and figures. Very minor corrections are not specifically identified; however, revisions requested by CAC members are included below.

- Chapter 1 text was re-ordered and broken up into two sections. It now starts with a description of the plan update requirements and then moves on to a section that reviews plan highlights.
- Figure 2-1 was revised to reflect the proper significant figures for the 1-hr ozone standard; Figures 2-1 and 2-2 were revised to include data from 1990.
- Figure 2-3 was revised to include the Santa Barbara monitoring station to the list.
- Figure 2-4 from the June Draft of Chapter 2 was moved to Chapter 5 and is now Figure 5-1, since the population vs VMT data relate better to the information included in Chapter 5.
- Figure 2-5 from the June Draft of Chapter 2 became Figure 2-4, and it was revised to more clearly depict the red line that represented population-weighted exposure levels.
- Table 2-1 was revised to fix errors in the reported significant figures.
- The emission inventory values in Chapter 3 were updated to reflect the most recent version of the ARB's California Emissions Projection Analysis Model (CEPAM) tool, version 1.04. As a result, some emission values changed (mostly ROC). Also, emissions from composting operations were manually added.
- Updated Chapter 4 text with new information based on CEPAM tool v1.04.

Written comments received

In addition to discussion at the CAC, two CAC members submitted written comments and clarifying questions. Clarifications were made, and the revisions that are detailed above also address the written comments that were received.