2007

CLEAN AIR PLAN

SUPPLEMENTAL EIR

SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

APCD – 2007 – SEIR – 01

SUPPLEMENT TO THE 1991 AIR QUALITY ATTAINMENT PLAN EIR
(SCH NO. 1991031045)

DRAFT

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PREPARED BY THE TECHNOLOGY AND ENVIRONMENTAL ASSESSMENT DIVISION

Santa Barbara County
Air Pollution Control District

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE 2007 CLEAN AIR PLAN APCD-2007-SEIR-01

TABLE OF CONTENTS

LIST OF TABLES

PAGE

APPENDICES

EXECUTIVE SUMMARY

Pursuant to the California Environmental Quality Act this document has been prepared to address the potential adverse environmental impacts of the 2007 Clean Air Plan (2007 Plan) for Santa Barbara County. The 2007 Plan, prepared by the Santa Barbara County Air Pollution Control District (APCD) is a comprehensive strategy to meet the requirements of both the California Clean Air Act of 1988 and the 1990 Federal Clean Air Act Amendments, as described below.

On June 15, 2004, USEPA replaced the federal one-hour ozone standard with an eight-hour ozone standard for Santa Barbara County and most parts of the country. This eight-hour ozone standard is set at 0.08 parts per million measured over eight hours and is more protective of public health and more stringent than the former federal one-hour standard. For the purposes of the federal eight-hour ozone standard, the County has been designated attainment. Santa Barbara County is subject to a maintenance plan for the federal eight-hour ozone standard required under Section 110(a) (1) of the federal Clean Air Act Amendments.

While Santa Barbara County's air quality has improved, we have yet to comply with the California one-hour ozone standard. In May 2006, ARB implemented a new, more health protective air quality standard for ozone with special consideration for children's health. The new state eight-hour ozone standard, set at 0.070 parts per million (ppm), is not to be exceeded and is in addition to the existing state one-hour ozone standard set at 0.09 ppm. Based on a preliminary examination of our ambient air quality data, Santa Barbara County will be classified as nonattainment for the eight-hour state ozone standard. All of the measures recommended in the 2007 Plan will also expedite our progress towards complying with the new state eight-hour ozone standard. The 2007 Plan will also meet the required triennial update requirements of the California Clean Air Act.

Like the previous air quality attainment plans, the 2007 Plan includes both stationary source control measures and transportation control measures. The implementation of the emission control measures in the 2007 Plan will reduce emissions of ozone precursors (reactive organic compounds and oxides of nitrogen) and help Santa Barbara County to make progress in attaining the state one-hour and eight-hour ozone standards and maintaining the federal eight-hour ozone standard. The control measures will also reduce emissions of carbon dioxide, a greenhouse gas that contributes to global warming and climate change.

The majority of the eleven proposed emission control measures included in the 2007 Plan are substantially the same as the control measures in the 2004 Clean Air Plan (CAP), 2001 CAP, 1998 CAP, 1994 CAP and the 1991 Air Quality Attainment Plan (AQAP). There are eight measures that are identical to the ones in the 2004 Plan and three measures are proposed with minor revisions in the 2007 Plan (shown in Table ES-1 below). These eleven proposed measures are to be adopted as APCD rules in the near-term (2007 - 2009) or mid-term (2010 - 2012) for the purpose of attaining the state one-hour ozone standard and maintaining the federal eight-hour ozone standard. The APCD has committed to revise nine rules that govern solvent use and reduce reactive organic compounds or ROCs (Rules 321, 323, 330, 337, 339, 349, 351, 353, and 354) and three rules that will reduce oxides of nitrogen or NOx (Rules 333, 361, and 352). Since most of these measures have been analyzed in previous environmental documents, only the three

revised ROC measures are analyzed in this SEIR. Measures classified as "further study measures" are not analyzed in this SEIR.

The APCD is the lead agency for this project under California Environmental Quality Act. Since the 2007 Plan will retain the same control measures described in the 2004 CAP, 2001 CAP, 1994 CAP and the 1991 AQAP with three minor updates, a supplemental environmental impact report (SEIR) to the environmental impact reports prepared for those plans is the appropriate document pursuant to CEQA Section 15163 (a)(2). A Notice of Preparation of a SEIR was not sent to interested public and government agencies through the State Clearinghouse because no comments were received on the 2004 CAP SEIR, the 2001 CAP SEIR and there are no substantive changes in the 2007 Plan.

This SEIR:

1) summarizes the previous environmental documents (the 1991 AQAP EIR, 1994 CAP SEIR, and the 1998 CAP Negative Declaration, 2001 CAP SEIR and 2004 CAP SEIR) and incorporates them by reference,

2) updates the environmental setting in terms of the resources in the County which may be affected by implementing the 2007 Plan,

3) describes the three revised ROC control measures listed in Table ES-1 representing the changes in project description from the 2004 Plan,

4) analyzes the potential environmental impacts of the above listed revised, "proposed" control measures and implementation strategies identified in the 2007 Plan. Table ES-2 is a summary of the potential impacts of implementing the 2007 Plan control measures and mitigation measures to reduce those impacts,

5) updates the 2004 CAP SEIR discussion of cumulative impacts, project alternatives, growth inducing impacts and other required EIR sections.

References are provided in Appendix A; Glossary in Appendix B and a draft Mitigation Monitoring Program is presented in Appendix C.

Table ES-1

PROPOSED 2007 PLAN EMISSIONS CONTROL MEASURES
(Revised measures in bold font)

Rule **To be Revised**	**CAP Control Measure ID**	**Description**
Emissions Control Measures Scheduled for Near-Term Adoption (2007- 2009):		
333	N-IC-1 and N-IC-3 (no change from 2004 CAP)	Control of Emissions from Reciprocating Internal Combustion Engines
321	R-SL-2 (no change from 2004 CAP)	Solvent Cleaning Machines and Solvent Cleaning (Revisions to Solvent Degreaser Requirements and New Solvent Cleaning Provisions)
330	R-SC-2 (no change from 2004 CAP)	Surface Preparation and Coating of Metal Parts and Products (Revisions to Include Solvent Cleaning Requirements)
337	R-SC-2 (No change from 2004 CAP)	Surface Preparation and Coating of Aircraft or Aerospace Vehicle Parts and Products (Revisions to Include Solvent Cleaning Requirements)
339	**R-SC-4 (changed from 2004 CAP)**	**Motor Vehicle and Mobile Equipment Surface Preparation and Coating Operations (Revisions to Include Solvent Cleaning Requirements and the State Suggested Control Measure for Limiting Coating and Solvent ROC Content)**
351	R-SC-5 (No change from 2004 CAP)	Surface Preparation and Coating of Wood Products (Revisions to Include Solvent Cleaning Requirements)
353	R-SL-9 (No change from 2004 CAP)	Adhesives and Sealants (Revisions to Include Solvent Cleaning Requirements)
361	N-XC-4 (No change from 2004 CAP)	Small Industrial and Commercial Boilers, Steam Generators, and Process Heaters (> 2 MMBtu/hr to < 5 MMBtu/hr) (Revision to the Rule 202 Permitting Threshold and the New Rule 361 will Establish NOx Limits for the Previously Unregulated Range)

Table ES-1

PROPOSED 2007 PLAN EMISSIONS CONTROL MEASURES (cont.)
(revised measures in bold font)

Rule **To be Revised**	**CAP Control Measure ID**	**Description**
Emissions Control Measures Scheduled for Mid-Term Adoption (2010 - 2012):		
354	**R-SL-7 (changed from 2004 CAP)**	**Graphic Arts (Revision to the Rule 202 to Eliminate Printing Exemptions and Revisions to Rule 354 to Include Solvent Cleaning and Additional Requirements for Rotogravure, Flexographic, Lithographic, Letterpress, and Screen Printing)**
352	N-XC-6 (No change from 2004 CAP)	Residential Water Heaters; Residential and Commercial Space Heaters (Revisions to Reduce the NOx Limits on the Residential Water Heaters)
321 or 323	**R-SC-1 (changed from 2004 CAP)**	**Architectural Coatings Revisions to, a) Limit the ROC Content of Solvents Used to Clean Application Equipment and, b) Possibly Adopt the Current State Suggested Control Measures for Architectural Coatings)**

Table ES-2

SUMMARY OF PROJECT IMPACTS AND MITIGATION

Issue Area	Potential Impacts	Control Measures	Mitigation Measures	Level of Significance* /Residual Impacts
WATER QUALITY	The ROC control measures use vapor control methods that have residual waste water or involve hazardous substances that could contaminate surface or ground water supplies.	R-SL-7; R-SC-1 and 4	Hazardous wastes shall be minimized and operator shall be subject to federal, state and local regulations. APCD shall notify relevant jurisdictions during permit and compliance stage.	Class II/ Insignificant
RISK OF UPSET	The recovery of volatile hydrocarbon vapors, saturated adsorption carbon and electrostatic sprayers create a hazard of fire and explosion.	R-SL-7; R-SC-1 and 4	Safe handling, operating, transportation, and disposal procedures shall be implemented consistent with federal, state and local regulations.	Class II/ Insignificant
HAZARDOUS MATERIALS	Some compliance methods generate hazardous waste materials such as carbon adsorption canisters, SCR or NSCR catalysts which could be disposed of improperly.	R-SL-7; R-SC-1 and 4	Hazardous wastes shall be minimized and operator shall be subject to federal, state and local regulations. APCD shall notify relevant jurisdictions during permit and compliance stage.	Class II/ Insignificant

* Level of Significance:
Class I Unavoidable, Significant
Class II Insignificant after Mitigation
Class III Adverse, but not Significant (Adverse Impacts are described in the 1991 AQAP EIR and are not repeated here).
Class IV Beneficial (Beneficial Impacts are described in the 1991 AQAP EIR and are not repeated here).

1.0 INTRODUCTION

The Santa Barbara County Air Pollution Control District (APCD) has prepared the 2007 Clean Air Plan to address the California Clean Air Act and the Federal Clean Air Act mandates for ozone. The 2007 Plan is a maintenance plan for the federal eight-hour ozone standard and provides a three-year update to the APCD's 2004 Clean Air Plan for the attainment of the State one-hour ozone standard. The control strategy will also help towards the attainment of the State eight-hour standard. In addition, since the control measures are designed to reduce emissions overall, CO2 emissions are also expected to decrease.

This document assesses the potential environmental effects of the 2007 Plan and was prepared by the APCD as the lead agency under the California Environmental Quality Act (CEQA). The 2007 Plan will retain the same control measures described in the 2004 CAP with a few updated measures and no new strategies that were not analyzed in the 1991 AQAP EIR. Therefore, this environmental document is a supplemental environmental impact report (SEIR) which contains information necessary to make the environmental impact report prepared for the 1991 Air Quality Attainment Plan (1991 AQAP) adequate for the 2007 Plan (CEQA Guidelines §15163). In compliance with CEQA, this supplemental EIR (2007 Plan SEIR) will be circulated for public review without re-circulating the previous 1991 AQAP EIR. When the APCD Board of Directors acts on the 2007 Plan, they will consider the 1991 AQAP EIR as revised by the 2007 Plan SEIR and make findings on each significant effect identified in both EIRs.

1.1 Statement of Purpose

The purpose of this SEIR is to describe for the public and decision-makers the potential environmental consequences of implementing the proposed 2007 Plan. CEQA also requires that projects that may significantly affect the quality of the environment be analyzed to reduce or eliminate adverse effects on the environment.

In keeping with the requirements of CEQA and its Guidelines, this document focuses only on the environmental impacts of the 2007 Plan that were not discussed in the previous environmental documents. The 2007 Plan SEIR briefly summarizes the 1989 Air Quality Attainment Plan (1989 AQAP) EIR, the 1991 AQAP program EIR, the 1993 Rate-of-Progress Plan (1993 ROP Plan) EIR, the 1994 Clean Air Plan (1994 CAP) Supplemental EIR, the 1998 Clean Air Plan (1998 CAP) Negative Declaration, the 2001 CAP SEIR and the 2004 CAP SEIR and incorporates by reference the analyses presented therein. These documents are available at the APCD office in Santa Barbara.

The 2007 Plan SEIR, like the 1991 AQAP EIR, is a program EIR, which assesses the impacts of the 2007 Plan and provides a general evaluation of the individual control measures. Like the 1991 AQAP EIR, it is also intended to lay the foundation for future environmental review of actions (rulemaking) undertaken according to the 2007 Plan.

1.2 Lead and Responsible Agencies

The Santa Barbara County APCD is responsible for the control of air emissions from stationary sources in the county and is the CEQA lead agency for this project. The APCD is responsible

for the implementation of the stationary source emission control measures to be adopted as APCD rules.

The California Air Resources Board (ARB) is the primary state agency responsible for air quality in the State of California. ARB will be the agency implementing the state-wide measures listed in the 2007 Plan. ARB is also responsible for approving the 2007 Plan. Therefore, ARB is a CEQA responsible agency.

1.3 Contents

- Section 1 provides the introduction and background, the purpose and describes the contents of this Supplemental Environmental Impact Report.

- Section 2 summarizes the previous environmental documents, especially the environmental impacts of the 1991 AQAP as determined in the 1991 AQAP EIR which this document supplements. This section also includes mitigation measures adopted to reduce or eliminate impacts of the 1991 AQAP.

- Section 3 contains the Project Description for the 2007 Plan which adds descriptions of new and revised control measures not included in the 1991 AQAP EIR.

- Section 4 includes a discussion of current conditions (the environmental setting) in the project area. The environmental setting defines the baseline for the analysis of potential impacts.

- Section 5 analyzes the environmental impacts. Criteria for determining significance are discussed and mitigation measures and residual impacts are described.

- Section 6 discusses the Cumulative Impacts of the 2007 Plan.

- Section 7 discusses the environmental impacts of alternatives to the project: the no project alternative and a more environmentally sensitive alternative. The impacts of these alternatives are evaluated in comparison to the proposed plan.

- Section 8 includes the CEQA topics of: the Relationship between Local Short-Term Uses and Long-Term Productivity, Significant Irreversible Changes, Growth Inducing Impacts and Socio-Economic Impacts.

- The Appendices include references and a draft Mitigation Monitoring Plan.

2.0 PREVIOUS ENVIRONMENTAL DOCUMENTS

Many of the control measures in the 2007 Plan were analyzed in the program EIR prepared for the 1991 Air Quality Attainment Plan. A brief summary of the 1991 AQAP EIR is provided below.

2.1 1991 Santa Barbara County Air Quality Attainment Plan

The 1991 Santa Barbara County Air Quality Attainment Plan was required under the 1988 California Clean Air Act for areas that do not meet the state's air quality standards (i.e., nonattainment areas). The 1991 AQAP was intended to achieve a five percent annual reduction in emissions of both Reactive Organic Compounds (ROC) and nitrogen oxides (NO_x) until the state ozone standard is met. The 1991 AQAP presented a detailed description of the air quality of the county and meteorological conditions primarily responsible for ozone formation, an inventory of the pollutant sources, short and long term air pollution control measure strategies, and the future air quality impacts expected under current and projected growth trends.

Reductions in emissions of ozone precursors, ROC and NO_x, are realized through the implementation of control measures. Table 2-3 in the 1991 AQAP EIR listed the emission control measures analyzed in the 1991 AQAP EIR along with the associated compliance methods.

The 1991 AQAP EIR identified rule requirements, compliance methods and potential environmental impacts from the compliance methods required by the APCD rules. The following compliance methods (i.e., control systems and/or control techniques) identified in the 1991 AQAP EIR could be used to comply with the APCD Rules and Regulations:

VR	Vapor Recovery
RE	Reformulation
TE	Transfer Efficiency
EC	External Combustion Modification
IC	Internal Combustion Modification
PC	Post-Combustion Modification
EL	Electric Motor Replacement
CF	Alternative Combustion Fuels
OM	Operational Modifications

In addition, the following general methods were included for use in complying with Transportation Control Measures:

TR	Trip Reduction
TF	Traffic Flow Improvement
AF	Alternative Transportation Fuels

2.1.1 Summary of Environmental Impacts of the 1991 AQAP

The 1991 AQAP EIR evaluated the impacts of the 1991 AQAP as a whole based on the compliance methods which would be employed to implement the 1991 AQAP. The EIR also evaluated the environmental impacts of the individual control measures that were adopted in the 1991 AQAP. A summary of the compliance methods that could be used by the affected sources to comply with individual control measures was provided in Section 2.1 of the 1991 AQAP EIR.

The environmental impacts of the 1991 AQAP are summarized below and are presented in Appendix A. No unavoidable potentially significant adverse impacts were identified (i.e., Class I impacts). The potentially significant adverse impacts of the 1991 AQAP that could be mitigated to a level of insignificance (i.e., Class II impacts) are associated with toxic and hazardous materials or other public safety concerns on a regional basis. Public safety (related to transportation and risk of upset), water resources, biological, and hazardous waste generation are areas where mitigation was required to avoid potentially significant adverse impacts. Most of the adverse environmental effects of the 1991 AQAP were classified as not significant.

One area of concern that had been identified as significant in the 1991 AQAP EIR (and the EIR on the 1989 AQAP) is the use of anhydrous ammonia. The potential for a significant impact was avoided in the 1991 AQAP by eliminating the use of anhydrous ammonia in emission control equipment and substituting the use of urea or aqueous ammonia as a reducing agent in the selective catalytic reduction (SCR) and selective non-catalytic reduction processes (NSCR). However, the substitution creates a tradeoff where the potential for impacts to water resources and biological resources increases and the risk of upset is reduced in significance. Impacts to water and biological resources were considered insignificant after mitigation.

The effects of emissions of Toxic Air Contaminants (TAC) were another area of concern associated with the 1991 AQAP that, when fully implemented, would affect a broad range of sources associated with TAC emissions. Most of ROC control measures reduce emissions by containing volatile compounds in the system. Since TACs are constituents of many of these compounds (especially ROCs from combustion), they are also reduced. However, solvents and coatings that have been reformulated to reduce ROC may be replaced with toxic compounds which are exempt from restrictions of APCD Rules and Regulations.

Nitrogen oxide (NO_x) control measures that increase energy efficiency also reduce TAC emissions associated with combustion fuels. But other controls reduce NO_x at the expense of decreased fuel efficiency resulting in increased TAC emissions associated with fuel combustion. Thus the actual implementation of 1991 AQAP has the potential to affect TAC emissions in an opposing manner. Overall, the reductions in TAC are greater than the increases. The EIR identified the positive and negative effects of the individual compliance methods.

Transportation Control Measures were associated with the potential to result in impacts such as: the use of hazardous alternative transportation fuels, increased transit system demand, public works demands, and public safety. The use of methanol as a substitute transportation fuel was cited as a potentially significant impact because of its physical and chemical properties and the need to transport greater quantities. The 1991 AQAP did not specify the means of achieving vehicle emission reductions. Instead, it required local jurisdictions to implement TCM plans that are appropriate for the locality by using any of a number of suggested Transportation Mitigation

Measures. The use of methanol was not encouraged. Other potentially adverse effects were identified but could not be clearly tied to significance criteria on a regional basis.

Overall the 1991 AQAP, when fully implemented, will improve the quality of the environment by improving air quality and increase the efficiency of the use of natural resources and the transportation of goods and people. Long-term impacts and effects on productivity were considered beneficial or insignificant if adverse. No significant irreversible changes were identified. Growth-inducing impacts were related to improved air quality and in turn the increased desirability to live in the county. The 1991 AQAP EIR concluded that it would be highly speculative, however, to attempt to separate normal growth under the county's General Plan from that specifically resulting from the 1991 AQAP.

The 1991 AQAP EIR included a Mitigation Monitoring Plan (MMP) to implement the measures required to reduce potentially significant impacts to a level of insignificance (see Appendix D of the 1991 AQAP EIR).

The 1991 AQAP control measures have been adopted as APCD rules or are currently going through the rule adoption process. Before being adopted as rules, individual CEQA review was conducted. The 1991 AQAP EIR and those CEQA documents which are addenda to the 1991 AQAP EIR are also used as references for this 2007 CAP SEIR. A copy of the 1991 AQAP EIR is available for review at the APCD's Santa Barbara office.

2.2 Other Previous Environmental Documents

2.2.1 1989 Air Quality Attainment Plan Environmental Impact Report

The 1989 AQAP EIR (SCH No. 89012511), a program EIR, was prepared by the APCD to assess the impacts of the 1989 Air Quality Attainment Plan (1989 AQAP). The 1989 AQAP applied only to the southern portion of Santa Barbara County and was required by the U.S. Environmental Protection Agency (EPA) to demonstrate attainment of the federal one-hour ozone standard in Santa Barbara County. The 1989 AQAP EIR examined the potential environmental effects of the 1989 AQAP, including the impacts of a county-wide implementation option examined in the alternatives section of the EIR. The 1989 AQAP EIR did not identify any significant impacts that could not be mitigated to insignificant levels.

The environmental impacts of greatest concern stemmed from the use of anhydrous ammonia in several control technologies for the reduction of nitrogen oxides. The potential for an accident, most likely to occur during transportation and involving a massive release of anhydrous ammonia gas, was considered to present a significant risk to public health and safety. Therefore the use of anhydrous ammonia in NO_x control was prohibited in the 1989 AQAP and in subsequent documents for the implementation of the Plan through the adoption of rules. A projected increase in traffic from service and supply vehicles to multiple facilities in the same area was also classified as a potentially significant impact to existing traffic congestion. The mitigation measure in the 1989 AQAP EIR required APCD permit conditions to specify and require documentation of delivery schedules that avoid peak traffic hours for such facilities. No other potentially significant impacts were identified.

2.2.2 1993 Federal Rate-of-Progress Plan EIR

The 1990 Federal Clean Air Act Amendments required all ozone nonattainment areas classified as moderate and above to submit a Rate-of-Progress Plan (1993 ROP Plan) to the Environmental Protection Agency by November 15, 1993. The 1993 Rate-of-Progress Plan affected all of Santa Barbara County. The purpose of the 1993 ROP Plan was to develop an inventory of ozone season emissions, an adjusted "base year inventory" for 1990 and a plan showing reactive organic compound (ROC) emission reductions of at least 15% by November 15, 1996. The base year for the 15% emission reduction was 1990. Therefore, any emission reductions resulting from rules adopted from 1990 onward counted towards the 15% reduction needed under the 1990 Federal Clean Air Act Amendments. For this reason existing and pending rules were included in the 1993 ROP Plan.

The implementation of the control measures in the 1993 ROP Plan was intended to reduce emissions of ROC. The majority of the ROC control measures in the 1993 Plan were substantially the same as the ROC control measures in the 1991 AQAP. Therefore, the finding was made that the 1991 AQAP EIR adequately described the general environmental setting of the project, significant environmental impacts of the project and alternatives and mitigation measures related to each significant effect. To be sufficient, both the circumstances and the environmental impacts of the two projects (the 1991 AQAP and the 1993 ROP Plan) are required to be essentially the same. The 1991 AQAP EIR was recirculated as the draft EIR for the 1993 ROP Plan. The final 1993 ROP Plan EIR, prepared as a subsequent document under CEQA Guidelines Section 15153, concluded that no significant impacts would result from the 1993 ROP Plan.

2.2.3 1994 Clean Air Plan Supplemental EIR (94-SD-3)

As required by the 1990 Federal Clean Air Act Amendments, the 1994 CAP was prepared as a revision of the 1989 AQAP and the 1993 ROP Plan. In addition, the 1994 CAP contained a request for redesignation from a nonattainment area to a maintenance area for the federal one-hour ozone standard along with a plan to show maintenance of that standard through the year 2006. These components were later withdrawn by the APCD.

The 1994 CAP also addressed the California Clean Air Act requirements for the triennial update of the 1991 Air Quality Attainment Plan (1991 AQAP). The 1994 CAP like the previous air quality attainment plans included both stationary source control measures and transportation control measures. The majority of the measures in the 1994 CAP were substantially the same as the control measures in the 1991 AQAP and the 1993 ROP Plan. The primary change in the project description in terms of the effects on the environment was the addition of Outer Continental Shelf sources to the APCD permit jurisdiction. The new Regulatory Flexibility Program was introduced in the 1994 CAP but the environmental impacts were not analyzed.

Since the proposed 1994 CAP retained the same control measures described in the 1991 AQAP with a few updated measures and new strategies, a supplement to an EIR (SEIR) was prepared which contained information necessary to make the program Environmental Impact Report prepared for 1991 AQAP adequate for the 1994 CAP, as revised (CEQA Guidelines, §15163). The 1994 CAP SEIR focused on the changes in project description, consisting of the control

measures (some of which are now adopted as APCD rules) that are relevant to Outer Continental Shelf sources. No additional significant issues other than those identified in the 1991 AQAP EIR were identified in the 1994 CAP SEIR.

2.2.4 1998 CAP Mitigated Negative Declaration (APCD-98-ND-01)

The 1998 Final Mitigated Negative Declaration was prepared for the 1998 Clean Air Plan. No new impacts were identified nor new mitigations adopted.

2.2.5 2001 Clean Air Plan Supplemental EIR (APCD-2001-SEIR-01)

The 2001 CAP was a revision of the 1998 Clean Air Plan (1998 CAP) and addressed all federal planning requirements for "Maintenance Plans" by providing for ongoing maintenance of the federal one-hour ozone standard through the year 2015. It also formally requested that U.S. Environmental Protection Agency re-designate Santa Barbara County as an attainment area for the federal one-hour ozone standard. The 2001 CAP established new on-road mobile source reactive organic compounds and oxides of nitrogen emission budgets to address federal transportation conformity requirements. It also addressed the California Clean Air Act requirements for the triennial update of the 1991 Air Quality Attainment Plan (1991 AQAP), the 1994 Clean Air Plan (1994 CAP) and the 1998 CAP for the state ozone standard. Like the previous air quality attainment plans, the 2001 CAP included both stationary source control measures and transportation control measures, however, there were no new Transportation Control Measures (TCMs) proposed for adoption in the 2001 Clean Air Plan. The implementation of the control measures in the 2001 CAP was intended to reduce emissions of the ozone precursors (reactive organic compounds and oxides of nitrogen) and help the County to make progress in attaining the state ozone standard.

The majority of the control measures evaluated for the 2001 CAP were substantially the same as the control measures in the 1998 CAP, 1994 CAP and the 1991 AQAP. However, three revised measures and five new measures were proposed in the 2001 CAP and analyzed in the 2001 CAP SEIR. The SEIR did not identify additional significant impacts and no new mitigations were adopted.

2.2.6 2004 Clean Air Plan Supplemental EIR (APCD-2004-SEIR-01)

The 2004 Clean Air Plan was prepared to address the California Clean Air Act mandates and was a three year update to the 2001 Clean Air Plan. The 2004 Plan retained, substantially, the same control measures described in the 2001 CAP, 1994 CAP and the 1991 AQAP. There were ten slightly revised measures, and three previously considered measures proposed as new Rules in the 2004 Plan. These thirteen proposed measures were proposed to be adopted as APCD rules in the near-term (2004-2006), mid-term (2007-2009) or long-term (2009-2011) for the purpose of attaining the state one-hour ozone standard. The supplemental environmental impact report (SEIR) for the 2004 Plan (2004 CAP SEIR) did not identify any new impacts or mitigation measures that were not previously considered.

3.0 2007 PLAN PROJECT DESCRIPTION

3.1 Project Proponent

The project proponent is:

Santa Barbara County Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110

3.2 Project Location

Geographically, the area covered by the 2007 Plan consists of the entire County of Santa Barbara including California coastal waters and the Outer Continental Shelf within 25 miles of the seaward boundary of the State and located off the coast of the County for which the APCD is the corresponding onshore area.

3.3 Project Objective and Characteristics

The 2007 Plan for Santa Barbara County, prepared by the APCD, is a comprehensive strategy to meet the requirements of both the 1990 Federal Clean Air Act Amendments and the California Clean Air Act of 1988. As such, the 2007 CAP is essentially a continuation of the "project" adopted by the District in 1991 with the adoption of the 1991 AQAP. As discussed below, the control measures of the 1991 AQAP are essentially the same as those now considered in the 2007 CAP. Where there are differences, these are discussed in detail below.

The 2007 Plan is a revision of the 2001 and 2004 Clean Air Plans, both of which are outgrowths and extensions of the 1991 AQAP. The 2007 CAP addresses all federal planning requirements for "Maintenance Plans" and provides for ongoing maintenance of the federal eight-hour ozone standard through the year 2014. The 2007 Plan like the previous air quality attainment plans, includes both stationary source control measures and transportation control measures and like the 2001 CAP and the 2004 Plan, there are no new Transportation Control Measures (TCMs) proposed for adoption in the 2007 Plan.

Proposed control measures, as used in this 2007 Clean Air Plan, have a dual function. When related to attainment of the state one-hour and eight-hour ozone standards, proposed control measures are considered "proposed". When related to maintaining the federal eight-hour ozone standard, proposed control measures are considered "contingency" measures. These measures are scheduled for adoption in either the near-term (2007 - 2009) or mid-term (2010 - 2012). Table 4-3 in the 2007 CAP shows the proposed control measures for this 2007 Plan.

Implementation of the proposed stationary source control measures in the 2007 Plan will reduce emissions of ozone precursors (reactive organic compounds and oxides of nitrogen) and help the County to make progress in attaining the state ozone standard.

The majority of the emission control measures evaluated for the 2007 Plan are substantially the same as the proposed control measures in the 2004 CAP. Of the twelve proposed control measures, none are new. Eleven are revisions to existing rules and one is a previously analyzed

control measure that will be adopted as a new rule. Eight measures (those whose CAP Control Measure ID in Table ES-1 commence with a "R") will reduce emissions of ROC and four measures (those whose CAP Control Measure ID commence with a "N") will reduce emissions of NO_x. These *proposed* measures are to be adopted as APCD rules in the near-term (2007-2009) or mid-term (2010-2012) for the purpose of attaining the state one-hour and eight-hour ozone standards and maintaining the federal eight-hour ozone standard. Emissions control measures that have already been adopted as rules before 2003 and Further Study Measures listed in the 2004 Plan are not included in this document because they have either been already analyzed and are therefore, part of the baseline conditions or they are not proposed for implementation and therefore not a part of the project. Only three proposed measures will be slightly revised (R-SC-4, R-SL-7 and R-SC-1) and these are described below in Section 3.4.

3.4 Description of 2007 Plan Control Measures

The majority of the control measures evaluated for the 2007 Plan are substantially the same as the control measures in the 2004 CAP, 2001 CAP, 1998 CAP, 1994 CAP and the 1991 AQAP. These proposed measures are to be adopted as APCD rules for the purpose of attaining the state one-hour ozone standard. The 2007 Plan organizes the control measures by their adoption schedule: there are nine measures scheduled for near-term adoption (2007-2009), and three measures scheduled for mid-term adoption (2010-2012). A complete description of the proposed measures analyzed in this SEIR is provided in the 2007 Plan which is hereby incorporated by reference.

Transportation Control Measures reduce emissions from on-road motor vehicles and trucks. The 2007 Plan, like the 2001 CAP and the 2004 Plan, does not propose new TCMs for adoption that are different from the ones adopted in the 1991 AQAP. Therefore, TCMs are not analyzed again in this supplemental EIR.

The 1991 AQAP EIR described and analyzed the impacts of the adopted, proposed, pending and contingency control measures. All the control measures that the 2007 Plan relies on to achieve the required emission reductions were analyzed in the 1991 AQAP EIR and subsequent environmental documents. Further Study Measures listed in the 2007 Plan are not included in this document because they are not proposed for implementation and therefore not a part of the project. The 2001 and 2004 Clean Air Plans indicated that a new Rule 362 would be adopted to implement the new "general" solvent cleaning control measure. Staff later decided to integrate these solvent cleaning requirements within existing Rule 321 and the appropriate operation-specific rules. Thus, the emission reductions committed to in the 2001 and 2004 plans will be obtained by revising the existing rules and existing control measures in the 2007 Plan. Table 3-1 shows the three revised control measures that will be analyzed in the 2007 Plan SEIR and the compliance methods to be used in implementing them. The compliance methods are:

Vapor Control (Vap. Con.)
Reformulation (Reformuln.)
Transfer Efficiency (Trans. Eff.)
Operation and Maintenance Methods (O and M)

Revised Control Measures Scheduled for Near –Term Adoption (2007-2009)

3.4.1 R-SC-4 (Revision to Rule 339) Motor Vehicle and Mobile Equipment Coating Operations.

Painting motor vehicles and mobile equipment causes ROC emissions and the process may also cause some toxic compounds to be emitted. Sources affected by this measure are automobile body repair and paint shops, automobile dealers, "do-it-yourselfers" and companies or agencies with their own in-house motor vehicle and mobile equipment coating operations. Product manufacturers and their representatives are also subject to the provisions of the control measures related to product formulation.

Rule 339 requires the use of low-ROC coatings and the use of approved or alternative application methods that achieve a transfer efficiency of at least 65 percent. Add-on exhaust control equipment such as after-burners or carbon adsorbers may be used and must reduce uncontrolled emissions by at least 90 percent.

The proposed revisions to Rule 339 will incorporate the revised solvent cleaning requirements patterned after the South Coast Air Quality Management District's Rule 1171 and will set ROC limits for specific solvent cleaning activities, require specific cleaning methods or devices and require proper storage and disposal of all ROC containing solvents as compliance methods. In addition to the new solvent cleaning requirements, the rule revisions will include changes recommended by the California Suggested Control Measure for Automotive Coatings (approved by the Air Resources Board on October 20, 2005). The state guidance includes limiting the cleaning solvents' ROC content to 25 grams of ROC per liter and revising the surface coating material ROC content limits.

Revised Control Measures Scheduled for Mid –Term Adoption (2010-2012)

3.4.2 R-SL-7 (Revised Rule 354) Graphic Arts

Printing operations that are regulated by this rule include graphic arts (rotogravure and flexography) but not letterpress, offset lithography, and screen printing. ROC emissions from graphic arts processes occur from evaporation of solvents in inks, dampening solutions and cleaning solutions.

The rule limits the ROC content of inks, fountain solutions and solvents; requires the use of closed containers for disposal of cleaning materials and restricts the application, storage and disposal of solvent.

The proposed revisions to Rule 354 will incorporate the revised solvent cleaning requirements patterned after the South Coast Air Quality Management District's Rule 1130 and will set ROC limits for specific solvent cleaning activities, require specific cleaning methods or devices and require proper storage and disposal of all ROC containing solvents as compliance methods.

Besides incorporating the solvent cleaning requirements, the proposed changes will include ink, coating, adhesive, resists, wash primers and fountain solution ROC-content requirements. The revised rule will include components, or be modeled on provisions, in the South Coast AQMD Rule 1130 (Graphic Arts) and Rule 1130.1 (Screen Printing Operations); San Joaquin Valley

Unified APCD Rule 4607 (Graphic Arts); and/or Ventura County APCD Rule 74.19 (Graphic Arts) and Rule 74.19.1 (Screen Printing Operations). Santa Barbara County APCD Rule 202 exemptions and Rule 354 exemptions, definitions, and rule requirements are planned to be revised for promulgating and implementing control techniques for gravure, flexography, lithography, letterpress, and screen printing methods. The incorporation of screen printing requirements into Rule 354 is new.

3.4.3 R-SC-1 (Revisions to Rule 323) Architectural Coatings

Architectural coatings are coatings applied to stationary structures and their appurtenances. Examples of coatings include house paints, stains, industrial maintenance coatings and traffic coatings. Painting structures with architectural coatings and related equipment cleanup activities release ROC and toxic air contaminant (e.g., benzene, toluene and xylene) emissions. Architectural coatings include lacquers, sealers, maintenance coatings, primers, stains and enamels.

This revision will limit the ROC content in solvents used to clean application equipment to 25 grams per liter. Also, the revision may include other provisions (e.g., lower coating ROC content limits) as specified in a post 2000 ARB Suggested Control Measure.

Table 3-1
2007 PLAN SEIR PROPOSED CONTROL MEASURES
AND COMPLIANCE METHODS

Rule #	2004 Plan SEIR Control Measures[1]	Vap. Con	Reformuln	Trans. Eff.	O and M.
339	R-SC-4 Motor Vehicle and Mobile Equipment Coating Operations	x	x	x	x
354	R-SL-7 Graphic arts	x	x		x
323	R-SC-1 Architectural Coatings		x		

[1] Proposed emission control measures are newly-revised control measures to be adopted in the near-term or mid-term for the purpose of attaining the state ozone std. and maintaining the federal ozone standard.

4.0 ENVIRONMENTAL SETTING

The following documents describe the existing Santa Barbara County environment setting and are incorporated herein by reference:

1. The 1991 Air Quality Attainment Plan Environmental Impact Report (91-EIR-4, State Clearinghouse Number 91031045)

2. The 1994 Clean Air Plan Supplemental EIR (94-SD-3)

3. The 1998 Clean Air Plan Mitigated Negative Declaration (APCD-98-ND-01)

4. The 2001 Clean Air Plan Supplemental EIR (APCD-2001-SEIR-01)

5. The 2004 Clean Air Plan Supplemental EIR (APCD-2004-SEIR-01)

4.1 Environmental Issues of Focus

Based on the previous environmental documents, Air Quality, Biological Resources, Hazards/Hazardous Material, Hydrology/Water Quality and Noise/Nuisance were identified as issue areas which would potentially be affected by the implementation of this project. For each issue area, however, the 1991 EIR and subsequent environmental documents concluded that there were no significant adverse impacts that could not be avoided, including cumulative impacts. The cumulative environmental impacts of all the proposed measures in the 2007 Plan and the potential environmental impacts of alternatives to the 2007 Plan project are discussed in Section 6 and Section 7 respectively. The following sections describe the Environmental and Regulatory Setting for each affected issue and the significance criteria used to evaluate project impacts.

4.2 Air Quality

Environmental Setting: Santa Barbara County is considered in attainment of the federal eight-hour ozone standard, but we do not meet the state one-hour ozone standard or the standard for particulate matter less than ten microns in diameter (PM10). There is not yet enough data to determine our attainment status for either the federal standard for particulate matter less than 2.5 microns in diameter (PM2.5) or the state PM2.5 standard. The state recently adopted a new eight-hour ozone standard that became effective in May 2006. Although the state has not yet issued attainment designations, our data indicate we will be considered in nonattainment of this standard. The U.S. Environmental Protection Agency officially revoked the federal one-hour ozone standard on June 15 of 2005.

Global Warming and Climate Change: On January 1, 2007 the California Global Warming Solutions Act (AB 32) went into effect. The Act commits the State to reduce its global warming emissions to 2000 levels by 2010 (11% below business as usual), to 1990 levels by 2020 (25% below business as usual), and 80% below 1990 levels by 2050. The California Air Resources Board is working on strategies to achieve these goals. Since the measures in the 2007 Clean Air Plan are designed to reduce emissions of ozone precursors, it is assumed that the Plan will not have a significant increase in carbon dioxide, methane or other greenhouse gases.

Regulatory Setting: The APCD has jurisdiction over the air resources of Santa Barbara County and the Outer Continental Shelf sources in the region for which the County is the corresponding onshore area.

Significance Criteria: A proposed project will not have a significant air quality effect on the environment if operation of the project will:

- emit (from all project sources) less than the daily trigger for offsets or AQIA set in the APCD New Source Review Rule, for any pollutant; and
- emit less than 25 pounds per day of NOx or ROC from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with adopted federal and state air quality plans.

4.3 Water Quality

Environmental Setting: The 1991 AQAP EIR (page 3-33) discusses the existing water resources of Santa Barbara County. Water quality varies considerably from one water basin to another. In general, the water quality is being degraded due to agricultural runoff (fertilizers and pesticides); public and private sewage treatment systems (e.g., reclamation projects and septic tanks) and sea water intrusion from over pumping of aquifers.

Regulatory Setting: In general, discharges are also governed by regulations implemented by the Regional Water Quality Control Board.

Significance Criteria: Any substantial degradation of existing water quality (marine or freshwater), contamination of a public water supply or depletion of groundwater supplies is considered to be a potentially significant adverse impact (CEQA Guidelines, Appendix G).

4.4 Biological Resources

Environmental Setting: The 1991 AQAP EIR (pages 3-33 through 3-38) discusses the existing biological resources of Santa Barbara County. Biologically sensitive coastal areas include, Santa Maria River Mouth, Santa Ynez Lagoon and many others. These areas are important habitat for numerous flora and fauna.

Regulatory Setting: At the state level, the California Coastal Commission, the California State Lands Commission, California Department of Fish and Game, the California State Water Resources Control Board have jurisdiction over the coastal areas of the County. The policies in the Santa Barbara County Local Coastal Plan and zoning ordinances, which generally conform to state coastal zone management objectives, are administered by the Santa Barbara County Planning and Development Department and the coastal cities.

Significance Criteria: The effects on biological resources are a function of the impacts on water quality, noise and nuisance and risk of upset. Any activity that would substantially affect a rare

or endangered species of animal or the habitat of the species; interfere substantially with the movement of any resident or migratory fish or wildlife species; or substantially diminish habitat for fish, wildlife or plants is considered to be a significant adverse impact (CEQA Guidelines, Appendix G).

4.5 Noise/Nuisance

Environmental Setting: The 1991 AQAP EIR discusses noise as an unwanted sound. The major sources of ambient noise in the County are from transportation on major highways, roadways, airports and the railroad. In general, the noise levels in the urban populated areas of the county range from 65 to 75 dB CNEL (Community Noise Equivalent Level).

Regulatory Setting: The County Planning and Development Department and the individual City Planning Departments issue land use permits. When a discretionary land use permit is required, noise levels at the property line are evaluated and must comply with the Noise Element of the Comprehensive Plan. In the workplace, Cal-OSHA implements and monitors noise regulations.

Significance Criteria: Noise generated by a project in excess of 65 decibels CNEL that could affect sensitive receptors would be considered a significant adverse impact. A significant noise impact would also occur where interior noise could not be reduced to 45 dB CNEL or less (County Thresholds). Significant nuisance impacts would result from activities that create a public nuisance by substantially increasing vibration, odor, fugitive dust or glare.

4.6 Risk of Upset

Environmental Setting: Accidental releases of hazardous substances could occur during transportation. Transportation of hazardous wastes in the County includes transporting of rocket fuel to Vandenberg Air Force Base and hauling of hazardous wastes to Class I landfills outside the County. Fire and explosion are primary hazards associated with drilling, production, bulk storage, processing and transportation of petroleum and petroleum by-products related to oil and gas facilities.

Regulatory Setting: The transport of hazardous wastes is regulated by the Federal Department of Transportation, the State Department of Health Services, the California Highway Patrol and Santa Barbara County. Fire and explosion are the purview of the County fire department and the individual city or community fire departments.

Significance Criteria: When the frequency of an accidental event cannot be estimated, accidental releases are determined to be significant if it would cause substantial adverse effects on human beings, either directly or indirectly, i.e., could result in injury or death to the public (1991 AQAP EIR).

4.7 Hazardous Materials

Environmental Setting: The largest generator of hazardous wastes in the County is the oil and gas industry, which generates about 68% (by weight) of the county's hazardous wastes. Other large generating industries include auto dealers and service stations (7%), utilities (5%) and the military (3%) (1991 AQAP EIR). There are no Class I hazardous waste landfills in the County

and most hazardous waste is hauled either by truck to the Chemical Waste Management Landfill at Kettleman City or by rail to Salt Lake City, Utah. Small business and household hazardous wastes are collected at the Hazardous Waste Collection Facility at the University of California's Santa Barbara campus and shipped out of the County periodically. Since the facility opened in 1992, the illegal disposal of small amounts of hazardous wastes is expected to have decreased.

Regulatory Setting: The California Department of Health Services Toxic Substances Control requires that hazardous waste shipped off-site be documented by a filed manifest identifying the type and quantity of wastes in the shipment and the origination and destination points.

Significance Criteria: The production, use or disposal of hazardous waste materials, which may pose a hazard to public or biological health, is considered to be a significant adverse impact (CEQA Guidelines, Appendix G).

4.8 Consistency with Applicable General Plans and Regional Plans

CEQA Guidelines § 15125 requires a discussion of any inconsistencies between the project and applicable local and regional plans. Consistency of the 2007 Plan with applicable plans such as the County's Comprehensive Plan, local General Plans, the Congestion Management Plan and the Regional Transportation Plan is discussed below. The 2007 CAP is the County's air quality plan with which all other local and regional plans are also required to be consistent.

The County’s Comprehensive Plan and the local General Plans are blueprints for future growth in the County. Consistency between the 2007 Clean Air Plan and these plans means that stationary and vehicle emissions associated with the existing and future land use development and resulting population and traffic increases are accounted for in the 2007 Clean Air Plan's emissions growth assumptions. The Draft 2007 Clean Air Plan relies on the land use and population projections provided in the 2004 Santa Barbara County Association of Governments' Regional Growth Forecast (RGF). The Final 2007 Clean Air Plan may incorporate the 2007 RGF when it is adopted by the SBCAG Board in 2007. The Regional Growth Forecast is generally consistent with the local plans; therefore, the 2007 Plan is potentially consistent with local general plans.

The Congestion Management Plan and the Regional Transportation Plan are prepared by the Santa Barbara County Association of Governments (SBCAG). The Congestion Management Plan is a regional planning document that identifies and addresses congestion on designated roadways in the County. The Congestion Management Plan sets level of service standards for designated roadways in the County, and identifies the responsibilities of local jurisdictions in implementing the policies in the Congestion Management Plan. The responsibilities of the APCD include preparing a list of measures that could contribute to significant improvements in air quality for use by local jurisdictions in developing deficiency plans, and developing transportation control measures (TCM) in response to the federal and state Clean Air Acts. The list of measures has been prepared by SBCAG. Chapter 5 of the 2007 Plan presents TCMs designed to reduce ozone levels in the County. Therefore, the 2007 Plan is consistent with the Congestion Management Plan. In general, the Regional Transportation Plan programs will result in a reduction in daily vehicle emission rates. Therefore, the 2007 Plan is consistent with the Regional Transportation Plan.

5.0 PROJECT IMPACTS AND MITIGATION MEASURES

Section 5 analyzes the environmental impacts of only the three control measures that are modified in the 2007 Plan. The environmental impact analysis in this document supplements the analysis of control measures and compliance methods performed in the 1991 AQAP EIR. For a description of the environmental impacts of all the control measures (previously adopted) in the 2007 Plan please refer to the 1991 AQAP EIR. The project environmental impacts and residual impacts are classified as follows:

a. Class I Impacts - Significant unavoidable adverse impacts for which the decision maker must adopt a statement of Overriding Consideration.
b. Class II Impacts - Significant environmental impacts that can be feasibly mitigated or avoided for which the decision maker must adopt findings and recommended mitigation measures.
c. Class III Impacts - Adverse impacts found not to be significant for which the decision maker does not have to adopt findings under CEQA.
d. Class IV Impacts - Beneficial impacts (Beneficial impacts are described in detail in the 1991 AQAP EIR and are not reiterated in this document).

5.1 R-SC-4 (Revision to Rule 339) Motor Vehicle and Mobile Equipment Coating Operations

The emission reduction methods specified in implementing the requirements of the rule are the use of add-on exhaust control equipment, transfer efficiency, the use of reformulated solvents and coatings, closed storage containers and prohibition on the sale of non-compliant coatings in the County. Transfer efficiency refers to the application of coatings with properly operating equipment, using the methods listed in the Rule. These methods include electrostatic application or high-volume low-pressure (HVLP) spray or paint brush or hand roller or any other method where the equipment is at least 65% efficient. Reformulation involves changing the original coating supplied by the manufacturer to achieve emissions reduction limits specified in the rule. These emission reduction methods are described in the 1991 AQAP EIR (pages 2-17 and 18) which is incorporated herein by reference.

The 1991 AQAP EIR (page 5-22) analyzed the environmental impacts of control measure R-SC-4 for automobile refinishing and discussed impacts on air and water quality, biological resources, risk of upset, utilities/energy and hazardous wastes, related to reformulation and transfer efficiency methods. The environmental impacts were classified as Class II (insignificant, after mitigation); Class III (adverse but insignificant) or Class IV (beneficial).

Class II impacts were related to the general tendency to treat water-based coatings and associated clean-up wastes as environmentally benign. This could result in improper disposal of hazardous waste and may potentially cause adverse impacts on water quality, biological resources. The use of electrostatic coating operations and the use of low molecular weight coatings which can be cured with ultraviolet/infrared light was also identified as a potentially significant risk of fire or explosion. The potential for the use of low-VOC substitutes which are toxic and/or associated with stratospheric ozone depletion, e.g., 1,1,1 trichloroethane in coatings and solvents reformulation, was classified as a Class III impact in the 1991 AQAP EIR.

The rule requires the proper handling and disposal of cleanup solvents used in equipment cleaning. Mitigation measures were included in the Mitigation Monitoring Program (MMP) of the AQAP EIR to notify the applicable jurisdictions during the permit review and compliance process. Residual impacts were classified as insignificant.

Overall, the proposed changes to Rule 339, as identified in Section 3.4.1, will strengthen the current rule to increase ROC emission reductions. Primarily, these changes relate to reformulation of these types of coatings and no adverse impacts have been identified as a consequence. Further, no relaxation in air quality standards and no increase in carbon dioxide emissions is expected to occur. The revisions will not cause new significant effects which were not addressed in the 1991 AQAP EIR and no new mitigation measures are required.

5.2 R-SL-7 (Revised Rule 354) Graphic Arts

Printing operations that are regulated by this rule include graphic arts (rotogravure and flexography) but not letterpress, offset lithography, and screen printing. The incorporation of screen printing requirements into Rule 354 is new. ROC emissions from graphic arts processes occur from evaporation of solvents in inks, dampening solutions and cleaning solutions. Control Methods: The rule limits the ROC content of inks, fountain solutions and solvents; requires the use of closed containers for disposal of cleaning materials and restricts the application, storage and disposal of solvent. Approved add-on controls may also be used.

The proposed rule revision requires the proper handling and disposal of cleanup solvents used in equipment cleaning. Mitigation measures were included in the Mitigation Monitoring Program (MMP) of the AQAP EIR to notify the applicable jurisdictions during the permit review and compliance process. Residual impacts were classified as insignificant.

Overall, the proposed changes to Rule 354 as identified in Section 3.4.2 will strengthen the current rule to increase ROC emission reductions, improve enforceability by the APCD and streamline recordkeeping requirements. ROC emission reductions relate to reformulation of these types of coatings and no adverse impacts have been identified as a consequence. No relaxation in air quality standards and no increase in carbon dioxide emissions is expected to occur. The revisions will not cause new significant effects which were not addressed in the 1991 AQAP EIR and no new mitigation measures are required.

5.3 R-SC-1 (Revised Rule 323) Architectural Coatings

Painting structures with architectural coatings and related equipment cleanup activities release ROC and toxic air contaminant (e.g., benzene, toluene and xylene) emissions. This revision will limit the ROC content in solvents used to clean application equipment to 25 grams per liter. Also, the revision may include other provisions (e.g., lower coating ROC content limits) as specified in a post 2000 ARB Suggested Control Measure. ARB as lead agency prepared a Program Environmental Impact Report (PEIR) prior to approving the architectural coatings SCM. In 2001, the APCD adopted a Final Tiered EIR to address these changes. No relaxation in air quality standards and no increase in carbon dioxide emissions are expected to occur. No adverse impacts were identified due to the proposed changes and, therefore, no mitigation measures are necessary.

6.0 CUMULATIVE IMPACTS

CEQA defines cumulative impacts as "two or more individual effects which when considered together are considerable or which compound or increase other environmental impacts... The cumulative impacts from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects" (CEQA Guidelines Section 15355).

The 1991 AQAP EIR examined two primary issues of concern that involve cumulative impacts beyond county borders, air pollution transport and electric power generation. Air pollution transport is considered to occur between Santa Barbara County, adjacent counties, the South Coast Air Basin (Los Angeles), and the Outer Continental Shelf. The cumulative effect of air quality plans of other districts was considered a beneficial effect. Secondly, the cumulative effect of control measures for replacing fossil-fueled equipment with electric equipment and the resulting effect on energy demand was discussed. The 1991 AQAP EIR concluded that it would be speculative to draw any conclusions on this issue.

Since the 1991 AQAP EIR and subsequent environmental documents included all issues in the discussion of cumulative impacts, no further discussion is necessary in this SEIR for the 2007 Plan. In particular, none of the proposed revisions to the three control measures discussed in Section 5 have any identified cumulative impacts. Additionally, since no increase in carbon dioxide or other greenhouse gas emissions is expected to occur, cumulative impacts on global warming and climate change are also expected to be insignificant.

7.0 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires that an EIR evaluate a range of reasonable alternatives to the proposed project (including the "No Project Alternative") that could feasibly attain the basic objectives of the project and evaluate the comparative merits of the alternatives. The discussion of alternatives must focus on alternatives capable of eliminating any adverse environmental effects of reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly (CEQA Guidelines Section 15126.6 (b)).

The key issue in determining the range of alternatives is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. The EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. A feasible alternative is one that can be "accomplished within a reasonable period of time, taking into account economic, legal, social and technological factors" (Public Resources Code 21061.1).

The 1991 AQAP EIR adequately evaluated the effects of three alternatives, a No Project Alternative, a less stringent control alternative and a more stringent control alternative as compared to the effects of the 1991 AQAP (Page 6-1 to 6-12).

The More Stringent Control Alternative discussed how greater control stringency could theoretically be obtained by adding additional control measures to the 1991 AQAP package, including further study measures (wineries, leaf blowers, barbecue lighter fluid and many others); comprehensive transportation control measures, controls for off-road mobile sources, lowered exemption thresholds and/or requiring greater control efficiencies.

The three alternatives were compared for each issue area. Under Air Quality the 1991 AQAP EIR discussed the effect of the three alternatives on ozone attainment, other criteria pollutants and air toxics and effects on global emissions of stratospheric ozone depleting gases and greenhouse gases. Effects on Transportation/Circulation (congestion, parking availability, public transit and transportation safety); Water Resources (water supply and water quality), general biological resources, Noise/Nuisance (noise and vibration, odor, dust and smoke), Risk of Upset (accidental release, fire and explosion) shifts in land use, Public Services (fire and emergency response and public works), Utilities/Energy (energy consumption, telecommunications and Hazardous Waste generation.

In general, the No Project Alternative and the Less Stringent Control Alternative were not considered to meet the basic objective of the 1991 AQAP, i.e., the attainment of the state ozone standard. The More Stringent Control Alternative was “determined to potentially result in technically or economically unreasonable requirements or other excessive adverse effects. The 1991 AQAP (the project) was chosen over the alternatives because it was considered to be, “the most efficient means of attaining the basic objectives of the California Clean Air Act while limiting adverse effects to a reasonable level”.

In the SEIR for the 2001 CAP, the alternatives analysis focused on eliminating any adverse environmental effects of implementing the 2001 CAP, as proposed, or reducing the adverse effects to a level of insignificance. The adverse environmental impacts identified in the 2007

Plan SEIR, may be attributed to improper hazardous waste generation and disposal (e.g., disposal of used carbon adsorption canisters, or paints), the use and transportation of hazardous or toxic substances in air pollution control and the use of stratospheric ozone depleting substitution compounds in the solvent industry. Therefore, based on these adverse impacts, two alternatives were selected. These were, the required No Project Alternative and an alternative requiring the APCD to encourage the use of less environmentally harmful compliance methods where feasible. The impacts of these alternatives are evaluated below in comparison to the 2007 Plan.

Alternative 1: The No Project Alternative

The No Project Alternative consists of not adopting the 2007 Plan. If the 2007 Plan is not adopted, the 2001 CAP and the 2004 CAP would continue to be in effect. The 2001 CAP does not fulfill the requirements of the Federal Clean Air Act under the County's revised attainment status. The 2004 CAP addresses the California Clean Air Act requirements but will not meet the requirements for the triennial update. Consequently, the primary objectives of the 2007 Plan will not be met. Therefore, the No Project Alternative is not viable.

Alternative 2: The More Stringent Alternative.

The control measures in the 2007 Plan and previous air quality attainment plans do not specify the compliance methods that must be used to achieve the specified emission limits. As discussed in the 1991 AQAP EIR and this supplemental EIR, certain compliance methods may result in potentially significant adverse impacts to water resources, biological resources, hazardous waste disposal and risk of upset. Mitigation measures to reduce these adverse impacts consist of notification to the various local, state and federal agencies with jurisdiction over these issues. However, these impacts could be avoided if compliance methods approved by the APCD for use by an operator were examined to select those with the least cross-media environmental impacts. This would be the Environmentally Superior Alternative. In terms of significant environmental impacts, compared to the 2007 Plan as proposed, the Environmentally Superior Alternative will not be substantially different. The residual impacts of the 2007 Plan (after mitigation measures have been applied) are insignificant. Adopting the Environmentally Superior Alternative may not be necessary given the SBCAPCD's strong CEQA program. As adopted in the APCD's CEQA Guidelines, each APCD permit is subject to environmental review and any potentially significant cross-media impacts are avoided or mitigated prior to issuing the permit.

8.0 OTHER CEQA TOPICS

Section 8 includes the CEQA topics of: the environmentally superior project, the Relationship Between Local Short-Term Uses and Long-Term Productivity, Significant Irreversible Changes, Growth Inducing Impacts, Socio-Economic Impacts and Consistency with applicable Plans and Policies. The following sections summarize the discussion of these issues in the 1991 AQAP EIR and the 2004 Plan SEIR. Since the 2007 Plan is similar to the 2004 Plan SEIR the discussion has not been amended for this SEIR.

8.1 Relationship Between Short-term Uses and Long-term Productivity

As required by Section 15126 (e) of the State CEQA Guidelines, the 1991 AQAP EIR discussed the cumulative and long-term effects of the 1991 AQAP which adversely affect the environment and justified why the project must be implemented now rather than in the future. The 2004 Plan is similar to the 1991 AQAP and there are some short term costs associated with the implementation of the plan in terms of commitment of financial, material and human resources. No significant environmental impacts which cannot be mitigated to a level of insignificance were identified. The air quality benefits of implementing the control measures, improving the efficiency of natural resource use and transportation systems, will enhance long term productivity. The reason for considering the implementation of the 2007 Plan now, instead of in the future, is because of Federal and State Clean Air Act mandates.

8.2 Significant Irreversible Changes

The 1991 AQAP EIR did not identify any significant irreversible environmental changes which would be involved in the proposed action should it be implemented (CEQA Guidelines Section 15126 (f)). The 2007 Plan like the 1991 AQAP would require an incremental use of limited non-renewable resources, such as water, energy, minerals and land. However, as documented in the 1991 AQAP EIR, the incremental use of resources attributable to any new and revised control measures in the 2007 Plan is not significant. In addition, since no increase in carbon dioxide or other greenhouse gas emissions is expected to occur, increase in global warming and climate change impacts are not expected to occur.

8.3 Growth Inducing Impacts

CEQA Guidelines Section 15126(g) requires the discussion of the ways in which the proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The 1991 AQAP EIR stated it is plausible that the improved air quality in the county could encourage people to move to the area as a healthier place to live, but it would be highly speculative to attempt to separate normal growth under the County's General Plan from that specifically resulting from the 2007 Plan.

8.4 Socio-Economic Impacts

The 1991 AQAP EIR discussed the beneficial socio-economic impacts of the plan, such as reduced health care costs, reducing damage to crops and forest, and reduced deterioration of some paints, dyes and textile fibers. Cost savings due to increased fuel efficiencies and growth of emission control industries were also cited.

The adverse socio-economic impacts of the control measures were listed as increased capital and/or operation and maintenance costs to individual businesses or residents. These were classified as adverse but not significant in the 1991 AQAP EIR.

APPENDIX A - REFERENCES

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APPENDIX B - GLOSSARY

APCD	Santa Barbara County Air Pollution Control District
AQAP	Air Quality Attainment Plan
AQIA	Air Quality Impact Assessment
AQMD	Air Quality Management District
ARB	(California) Air Resources Board
Btu	British thermal unit
CAP	Clean Air Plan
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
EPA	(United States) Environmental Protection Agency
FCAAA	Federal Clean Air Act Amendments
MMP	Mitigation Monitoring Plan
ND	Negative Declaration
NO_x	Nitrogen oxides or oxides of nitrogen
NSCR	Selective Non-Catalytic Reduction
PEIR	Program Environmental Impact Report
ROC	Reactive Organic Compound
ROP	Rate-of-Progress (Plan)
SBCAG	Santa Barbara County Association of Governments
SCH	State Clearinghouse
SCM	Suggested Control Measure
SCR	Selective Catalytic Reduction
SEIR	Supplemental Environmental Impact Report
TAC	Toxic Air Contaminant
TCM	Transportation Control Measure

APPENDIX C – MITITGATION MONITORING PLAN FOR THE 2007 PLAN

Impact	Mitigation Measures	Monitoring Actions	Monitoring Responsibility	Monitoring Schedule
Water Quality: Ground and surface water could be contaminated by materials or waste products used by some emission control systems.	Wastewater or other waste streams shall be treated to meet discharge standards or handled as hazardous waste.	Any source proposing to use emission control systems involving waste streams, the operator is subject to the regulations of relevant jurisdictions.	County Environmental Health Service (EHS), local sanitary district, Regional Water Quality Control Board, State Fish and Game; USEPA (on OCS or federal lands), Minerals Management Service (MMS).	APCD will notify relevant jurisdictions during APCD permit and compliance process.
Biological Resources: Compliance methods that adversely impact humans or water resources will also impact flora and fauna.	Adverse impacts to flora and fauna shall be minimized.	All mitigation measures identified under air quality, water quality, noise/nuisance, risk of upset and hazardous wastes shall be implemented.	State Dept. of Fish and Game, MMS.	APCD will notify relevant jurisdictions during APCD permit and compliance process.
Noise/Nuisance: The use of compressors, fans or pumps in emission control may increase ambient noise substantially. Night time glare from flares used to destroy ROC emissions may have an impact in visually sensitive areas.	Noise shall be mitigated in compliance with OSHA regulations. Planned flaring shall be restricted to day time hours or enclosed flares shall be used.	Any source proposing to use noise-generating equipment shall be subject to the regulations of relevant jurisdictions.	Occupational Safety Health Agency, MMS (for OCS).	APCD will notify relevant jurisdictions during APCD permit and compliance process.
Risk of Upset: The use of carbon adsorption canisters and electrostatic sprayers may create a hazard of fire and explosion.	Safe handling, operating, transportation, and disposal procedures shall be used.	Any source proposing to use emission controls which increase risk of fire and explosion shall implement procedures consistent with relevant federal, state and local regulations.	Local Fire Departments Office of Emergency Management (OEM), EHS, USEPA	APCD will notify relevant jurisdictions during APCD permit and compliance process.
Hazardous Wastes: Used carbon canisters or used catalysts could be disposed of improperly.	All hazardous wastes generated during emission control processes shall be disposed of properly.	Operator shall be subject to federal, state and local regulations governing the disposal of hazardous wastes.	EHS, County Fire Dept., Local Fire Dept., USEPA, US Dept. of Transportation, Calif. Highway Patrol.	APCD will notify relevant jurisdictions during APCD permit and compliance process.