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SANTA BARBARA COUNTY
BOARD AGENDA LETTER



Clerk of the Board of Supervisors
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Agenda Number: 9/22/06
Prepared on: 9/22/06
Department Name: Planning and Development
Department No.: 053
Agenda Date: 10/3/06
Placement: Departmental
Estimate Time: 30 minutes
Continued Item: Yes
If Yes, date from: 9/12/06

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TO: Board of Supervisors

FROM: John Baker, Director
Planning and Development Department

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SUBJECT: Interim Air Quality Thresholds to Reflect Those of the Santa Barbara County Air Pollution Control District

Recommendation(s): That the Board of Supervisors adopt an interim revision to the County’s *Environmental Thresholds and Guidelines Manual*, Chapter 5, Air Quality Thresholds, Section C.2.a., (Long-Term/Operational Emission Thresholds – Zone Precursors (NO_x and ROC) that would align the County’s quantitative threshold to be more consistent with that of the Air Pollution Control District.

Alignment with Board Strategic Plan: Goal I – An Efficient Government Able to Anticipate and Respond Effectively to the Needs of the Community.

Executive Summary and Discussion:

Proposal to revise Chapter 5, Air Quality Thresholds, Section C.2.a., (Long-Term/Operational Emission Thresholds – Zone Precursors (NO_x and ROC) of the County’s *Environmental Thresholds and Guidelines Manual* to align with the Air Pollution Control District (APCD) threshold. The County’s current threshold is 25 pounds per day whereas the APCD threshold is effectively 55 pounds per day. The revision will provide consistency between the subject agencies and facilitate processing of projects with estimated emissions calculated to be between the two threshold triggers.

Environmental Thresholds of Significance:

The California Environmental Quality Act (CEQA) sets forth a legal framework for identifying significant effects on the environment for discretionary actions taken by state and local governments that qualify as a “project” pursuant to the act. CEQA reserves the role of determining significance for the lead agency, pursuant to guiding limitations expressed by law. As recommended by the Governor’s Office of Planning and Research, the County has adopted thresholds of significance as part of its *Environmental Thresholds and*

Guidelines Manual. These thresholds indicate at what point a given environmental effect should be considered significant.

County guidelines for implementation of CEQA specify processes for revising the *Environmental Thresholds and Guidelines Manual*, as necessary to reflect new information or changed environmental circumstances.¹ The process typically requires public hearings before the Planning Commission in north and south county locations. The Planning Commission then forwards its recommendations on revisions to the Board of Supervisors for final consideration. However, the guidelines also outline an option for the Board to adopt interim revisions to thresholds without the foregoing public process. After adoption, interim revisions are subject to the typical process of hearings before the Planning Commission and Board of Supervisors, when the *Environmental Thresholds and Guidelines Manual* is periodically updated.

Air Quality Thresholds:

Chapter 5 (attached) establishes thresholds for air quality, including a quantitative threshold of 25 pounds per day of nitrogen oxides (NO_x) or reactive organic compounds (ROC) as the air-quality threshold of significance applied to long-term operational emissions of a proposed project including both stationary and mobile sources. This threshold was last modified in April of 1994 and reflected the threshold applied by the APCD. In 1995, the APCD became a separate district and revised its threshold for NO_x and ROC emissions from stationary sources to concur with the emission trigger thresholds outlined in the APCD New Source Review Rule. As such, the APCD Environmental Review Guidelines threshold for NO_x and ROC was revised to 240 pounds per day, consistent with the New Source Review Rule at the time (October 1995). Subsequently the APCD revised the New Source Review Rule regarding the emissions levels that require offsets. Offsets are now required if NO_x or ROC emissions from stationary sources exceed 55 pounds per day.

Proposed Interim Air Quality Thresholds:

Staff is proposing to reconcile the difference in air-quality thresholds through a two-phased process. First, staff recommends an interim revision that would bring the County's threshold into agreement with where APCD staff believes the threshold should now rest. Second, staff recommends a more rigorous examination in collaboration with APCD and stakeholders to draft and consider a final threshold revision. This second phase would entail hearings by the County's Planning Commission and Board of Supervisors, as discussed above.

Staff proposes to replace Section C. 2. a. Long-Term/Operational Emission Thresholds – Zone Precursors (NO_x and ROC) of Chapter Five of the *Environmental Thresholds and Guidelines Manual* with the thresholds outlined in Article V, Section F (Environmental Thresholds of Significance), of the APCD document *Environmental Review Guidelines for the Santa Barbara Air Pollution Control District (Revised November 16, 2000)* as interim thresholds for long term operational emissions of a proposed project as follows:

*A proposed project will not have a significant air quality effect on the environment, if:
Operation of the project will:*

¹ *Guidelines for the Implementation of the California Environmental Quality Act of 1970, As Amended*, 11/22/05 edition, p. 12.

- *emit (from all project sources,² mobile and stationary), less than the daily trigger³ for offsets set in the APCD New Source Review Rule, for any pollutant; and*
- *emit less than 25 pounds per day of oxides of nitrogen (NO_x) or reactive organic compounds (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 the adopted federal and state Air Quality Plans.*

As noted above, the offset trigger for NO_x and ROC as specified in the APCD New Source Review Rule is 55 pounds per day, therefore, the County's Environmental Threshold of Significance for nitrogen oxides (NO_x) or reactive organic compounds (ROC) applied to long-term operational emissions as outlined in Chapter 5 of the *Environmental Thresholds and Guidelines Manual* would change from 25 pounds per day to 55 pounds per day. This revision also requires deleting the project screening for long term impacts discussion and Table 2 (Screening Table to Determine Potentially Significant Long Term Air Quality Impacts) in Section C. 2. a. as that information is based on the 25 pounds per day significance criteria.

Staff proposes the interim revision to address several recently proposed projects which, based on the proposed emissions calculations, were determined to lie between the County's threshold of significance and the APCD's offset trigger. This interim measure would reconcile the County's quantitative threshold with that of the Air Pollution Control District and facilitate processing of those project applications. Staff is also proposing to update the entire Air Quality section of the *Environmental Thresholds and Guidelines Manual* to be presented during the final adoption of the revision before the Planning Commission and Board of Supervisors. Initial work on this latter work would be financed through the Energy Division's budget for interagency activities.

Mandates and Service Levels: County guidelines direct that the *Environmental Thresholds and Guidelines* used to comply with CEQA be amended periodically, as necessary to reflect new information or changed environmental circumstances. Efforts herein to reconcile quantitative differences between the County's air-quality thresholds and those of APCD would enhance customer service.

Fiscal and Facilities Impacts: Staff costs to process the interim revision to the air-quality threshold are budgeted in the Planning and Development Department's FY 2006-07 budget, page D-302, under the operating-expenditure category of "Long-Range Planning."

² *Portable equipment registered under the California Air Resources Board Statewide Portable Equipment Registration Program (PERP) shall not be included a proposed project's emission total. Emissions from these sources are in compliance with the ARB PERP program, and are exempt from APCD permits.*

³ *Where projects exceed the offset trigger, the significant effect shall be considered mitigable to insignificance where APCD rules require offsets and net emissions after offsets are less than the trigger for offsets.*

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Special Instructions: N/A

Concurrence: N/A

Prepared by: Dean Dusette

Attachment: Chapter 5, Air Quality Chapter 5 – Air Quality Thresholds, *County of Santa Barbara Environmental Thresholds and Guidelines Manual*

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