

Staff Report

**ARB Review of the  
Ventura County 2016 Plan for the  
2008 8-Hour Ozone Standard**

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California Environmental Protection Agency  
 **Air Resources Board**

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**For questions, contact:**

Austin Hicks, Air Pollution Specialist  
South Coast Air Quality Planning Section  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Phone: (916) 322-8279  
Email: [austin.hicks@arb.ca.gov](mailto:austin.hicks@arb.ca.gov)

Or

Carol Sutkus, Manager  
South Coast Air Quality Planning Section  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Phone: (916) 322-1229  
Email: [carol.sutkus@arb.ca.gov](mailto:carol.sutkus@arb.ca.gov)

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## **EXECUTIVE SUMMARY**

This report presents the Air Resources Board (ARB or Board) staff's assessment of the 2016 Ventura County Air Quality Management Plan (2016 Plan) by Ventura County Air Pollution Control District (Ventura County or the District). ARB staff has concluded that the 2016 Plan meets the SIP planning requirements of the Act, including attainment demonstration, reasonably available control measure demonstration, reasonable further progress demonstration, contingency measures for progress and attainment, and transportation conformity budgets. The Board is scheduled to consider the 2016 Plan on March 23, 2017. If adopted, ARB will submit the 2016 Plan to the U.S. Environmental Protection Agency (U.S. EPA) as a revision to the California State Implementation Plan (SIP).

The federal Clean Air Act (the Act) requires U.S. EPA to set air quality standards and periodically review the latest health research to ensure that standards remain protective of public health. Based on research demonstrating adverse health effects at lower exposure levels, U.S. EPA has set a series of increasingly health protective ozone standards, beginning with a 1-hour ozone standard in 1979. Subsequent health studies demonstrated the greater effects of exposure to ozone over longer time periods, resulting in U.S. EPA establishing an 8-hour ozone standard of 80 parts per billion (ppb) in 1997, and the 75 ppb standard in 2008. ARB and the District have developed a series of State Implementation Plans (SIPs) defining actions needed to meet these standards, with each SIP and the corresponding control programs providing the foundation for subsequent planning efforts. The SIP process established under the Act has been an important driver for air quality progress in Ventura County.

The 2016 Plan addresses the 2008 federal 8-hour ozone standard of 75 ppb, representing the next building block in planning efforts to meet increasingly health protective air quality standards. Since 1979, the District's ozone strategy has relied on concurrent oxides of nitrogen (NO<sub>x</sub>) and reactive organic gases (ROG) emission reductions from stationary and mobile sources. Over the past decade ozone levels in Ventura County have shown significant improvement in response to reductions in emissions of NO<sub>x</sub> and ROG from current control programs despite a 27.5 percent increase in population. Most of these reductions come from on-road mobile sources. ARB's comprehensive strategy to reduce emissions from mobile sources consists of emission standards for new vehicles, in-use program to reduce emissions from existing vehicles and equipment fleets, cleaner fuels, and incentive programs to accelerate market penetration of the cleanest vehicles beyond what is achieved by regulations alone. These programs will provide 23 percent reductions of NO<sub>x</sub> and 16 percent reductions of ROG that will provide for attainment of the standard by the District's attainment deadline of 2020.

## **I. BACKGROUND**

The Act requires U.S. EPA to set air quality standards and periodically review the latest health research to ensure that standards remain protective of public health. Based on research demonstrating adverse health effects at lower exposure levels, U.S. EPA has set a series of increasingly health protective ozone standards, beginning with a 1-hour ozone standard in 1979. Subsequent health studies demonstrated the greater effects of exposure to ozone over longer time periods, resulting in U.S. EPA establishing an 8-hour ozone standard of 80 ppb in 1997, the 75 ppb standard in 2008 and more recently, the 70 ppb standard in 2015.

Effective on July 20, 2012<sup>1</sup>, U.S. EPA designated Ventura County as a nonattainment area with a Serious classification and a July 20, 2021 attainment date. To address the 75 ppb 8-hour ozone standard, on February 14, 2017, Ventura County APCD adopted the 2016 Plan. Due to the timing of the ozone season, Ventura County must demonstrate the Ventura County nonattainment area will attain the standard by 2020. The 2016 Plan also addresses Act requirements applicable to a Serious 8-hour ozone nonattainment area, consistent with U.S. EPA's 2015 Implementation Rule for the 75 ppb 8-hour ozone standard (Implementation Rule).<sup>2</sup>

## **II. NATURE OF THE OZONE PROBLEM IN VENTURA COUNTY**

Ventura County is located west of Los Angeles County and is bordered by Kern County to the north, Santa Barbara County to the west, and the Pacific Ocean to the southwest. It includes the Channel Islands National Park and serves as a gateway to this five-island marine sanctuary. Ventura County's economic base includes agriculture, biotechnology, military testing, oil production, technology, and tourism. Port Hueneme serves as the western U.S. distribution network for many imported vehicles and houses the largest refrigerated fruit terminal on the West Coast.

Ventura County has a combination of undeveloped and agricultural lands, as well as developed urban areas. The Los Padres National Forest accounts for 860 square miles of the northern portion of the County (46 percent of the County's land mass). The County's mountains, valleys, and seashore give the area six different microclimates, more than any other county in the nation.

Elevated smog occurs in Ventura County during the late spring through early fall, when high temperatures and stable atmospheric conditions favor ozone formation. Ozone generally reaches peak levels by mid-afternoon and, along with ozone precursors, is often transported inland by the prevailing winds. As a result, inland areas such as Simi Valley, Thousand Oaks, Ojai, Fillmore, and Piru continually have higher ozone levels

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<sup>1</sup> 77 FR 30088, Posted May 21, 2012 and effective July 20, 2012, "Air Quality Designations for the 2008 Ozone National Ambient Air Quality Standards", <https://www.gpo.gov/fdsys/pkg/FR-2012-05-21/pdf/2012-11618.pdf>

<sup>2</sup> 80 FR 12264 <http://www.gpo.gov/fdsys/pkg/FR-2015-03-06/pdf/2015-04012.pdf>

and more days in exceedance of the federal ozone standard than the County's coastal areas.

Ozone in the Ventura County nonattainment area is caused by both locally generated emissions and transport from the South Coast Air Basin; the Los Angeles County portion of the South Coast Air Basin lies directly east of Ventura County. Ocean-going vessels calling on Port Hueneme or the ports of Los Angeles/Long Beach and transiting vessels passing through southern California waters, but without calling at either port, also impact Ventura County's air quality. The federal 8-hour ozone nonattainment area includes all of Ventura County except the Channel Islands.

Significant improvements in Ventura County's air quality have occurred over the last 15 years. Between 2000 and 2015, NOx and ROG emissions have been reduced by 42 and 45 percent, respectively. The District has made significant progress in attaining the federal 1-hour and 80 ppb 8-hour ozone standards. On May 27, 2009, U.S. EPA determined that the Ventura County nonattainment area attained the 1-hour ozone standard by its attainment date.<sup>3</sup> On September 14, 2012, U.S. EPA determined that the Ventura County nonattainment area attained the 80 ppb 8-hour ozone standard by its attainment date.<sup>4</sup> The District is also making steady progress towards the 75 ppb 8-hour ozone standard.

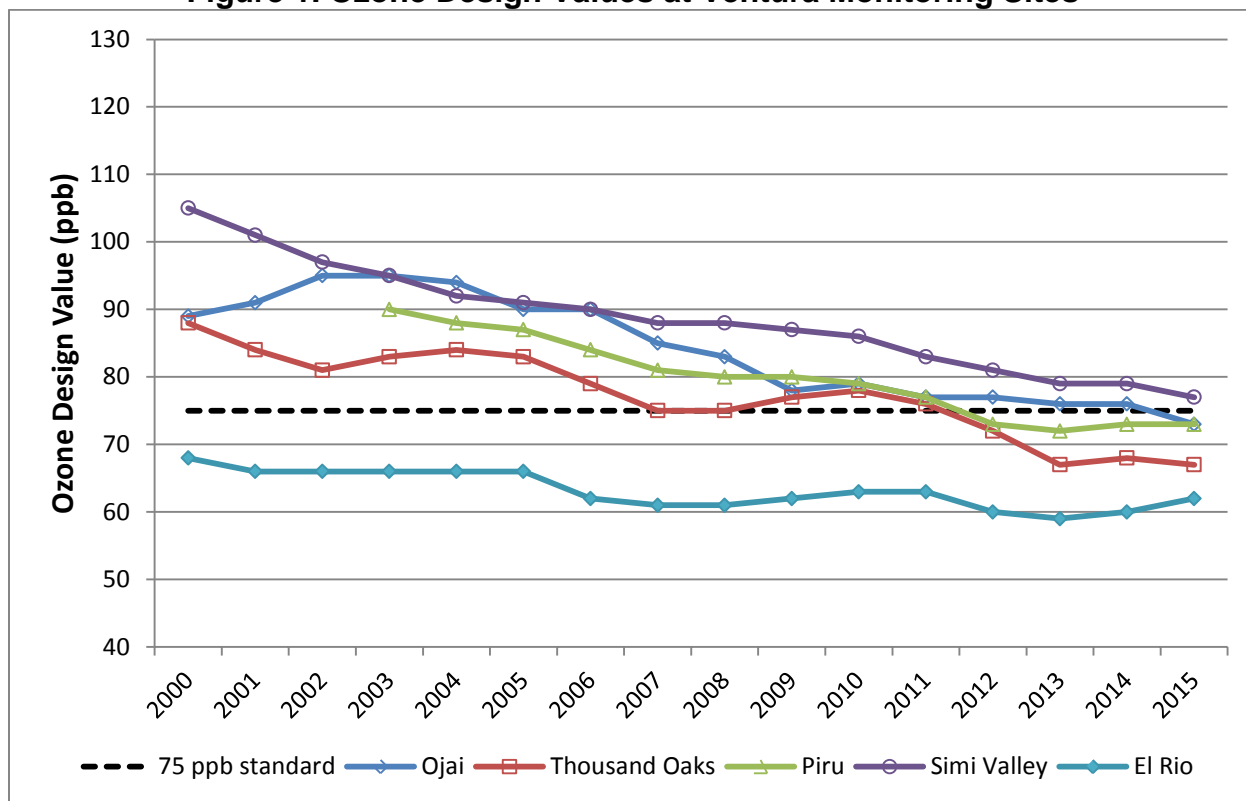
Design values are used to demonstrate an area's ozone compliance status in relation to the standard. The design value is the 4<sup>th</sup> high, 8-hour ozone value averaged over three years. Figure 1 shows the design value concentrations at each monitoring site in Ventura County from 2000 to 2015. Between 2000 and 2015, the design value decreased by 27 percent from 105 ppb to 77 ppb and the number of exceedance days in Ventura County declined by 95 percent and. In 2000, all sites exceeded the 75 ppb standard. Four out of the five monitoring sites now meet the 75 ppb federal standard. The fifth site, Simi Valley, is on track to meet the standard within the next few years.

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<sup>3</sup> 74 FR 25153, Posted May 27, 2009 and effective July 27, 2009, "Approval and Promulgation of Air Quality Implementation Plans; California; Determination of Attainment of the 1-Hour Ozone Standard for the Ventura County Area", <https://www.gpo.gov/fdsys/pkg/FR-2009-05-27/pdf/E9-12135.pdf>

<sup>4</sup> 77 FR 56775, Posted September 14, 2012 and effective November 13, 2012, "Approval and Promulgation of Implementation Plans; California; Determinations of Attainment for the 1997 8-Hour Ozone Standard", <https://www.gpo.gov/fdsys/pkg/FR-2012-09-14/pdf/2012-22469.pdf>

**Figure 1. Ozone Design Values at Ventura Monitoring Sites**



Source: 2016 Plan, Table K-6: Ozone Design Values at Ventura County Monitoring Sites

### III. DEMONSTRATING ATTAINMENT

SIPs must identify both the magnitude of reductions needed and the actions necessary to achieve those reductions as part of demonstrating attainment of the standard. The District has prepared an attainment demonstration that provides for expeditious attainment of the 75 ppb 8-hour ozone standard.

The Act requires the use of air quality modeling to relate ozone levels to emissions in a region and simulate future air quality based on changes in emissions. The Ventura County ozone nonattainment area is a small part of the greater Southern California region. The photochemical model used in this plan covers the entire Southern California region and a portion of northern Mexico. The modeling effort has been performed as a joint project by all of the air districts in the region and South Coast Air Quality Management District (South Coast AQMD).

The modeled attainment demonstration in this plan was prepared using photochemical dispersion and meteorological modeling tools developed in response to U.S. EPA modeling guidelines<sup>5</sup>, and recommendations from air quality modeling experts. The

<sup>5</sup> U.S. EPA, 2014, Draft Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5 and Regional Haze, available at [https://www.epa.gov/ttn/scram/guidance/guide/Draft\\_O3-PM-RH\\_Modeling\\_Guidance-2014.pdf](https://www.epa.gov/ttn/scram/guidance/guide/Draft_O3-PM-RH_Modeling_Guidance-2014.pdf)



model uses emission inventories, with measurements of meteorology and air quality, to establish the relationship between emissions and air quality. The modeling is used to identify the benefits of controlling ozone precursors and the most expeditious attainment date.

The year 2012 was chosen as the modeling base (or reference) year. The future year modeled was 2020, the year attainment must be demonstrated for a Serious ozone nonattainment area. The attainment demonstration modeling includes the benefits of ARB’s mobile source control program and District regulations submitted through November 2016. These measures provide the necessary control strategy, demonstrating that the Ventura County nonattainment area will meet the 75 ppb 8-hour ozone standard by 2020. Table 1 summarizes the 2012 and 2020 emissions modeled in the attainment demonstration. Emissions of NOx are predicted to decline by 23 percent and ROG by 16 percent, with the largest reductions coming from on-road mobile sources.

**Table 1. Ventura County Base Year and Attainment Year Emissions**  
(tpd, summer planning inventory)

Source Category	NOx		ROG	
	2012	2020	2012	2020
<b>Stationary and Area-wide</b>	3.4	2.8	20.2	19.6
<b>On-Road Motor Vehicles</b>	12.6	6.0	8.5	4.2
<b>Off-Road Vehicles and Equipment</b>	24.5	22.4	9.0	7.9
<b>TOTAL</b>	40.5	31.2	37.8	31.8

Source: 2016 Plan, Appendix A: *Ventura County Emissions Inventory Documentation*  
Numbers may not add up due to rounding

Results of the attainment demonstration modeling are shown on Table 2. The 2020 design values are predicted to be below the 75 ppb standard at all sites, with design values that range between 66 and 72 ppb including the design site Simi Valley.

Further information on the modeled attainment demonstration is included in Chapter 5 and Appendices H, I, and J of the 2016 Plan.

**Table 2. Modeled 8-hour Ozone Design Values Demonstrating Attainment**

Site	2012 Base Year Design Value (ppb)	2020 Future Year Design Value (ppb)
Thousand Oaks	69	66
Piru	72	66
Ojai	76	70
Simi Valley	79	72

Source: 2016 Plan, Table I-2: *Base Year and Future Year Ozone Design Values (ppb)*

Note: Design values for the El Rio monitoring station were not included because there were not at least five days in the base year (2012) that had maximum daily 8-hour ozone concentrations greater than or equal to 60 ppb and the draft 2014 U.S. EPA modeling guidance recommends that future design values not be calculated when this is the case.

U.S. EPA modeling guidance requires that modeled attainment demonstrations be accompanied by a weight of evidence analysis (WOE) to provide a set of complementary analyses. Examining an air quality problem in a variety of ways provides a more informed basis for the attainment strategy as well as better understanding of the overall problem and the level and mix of emissions controls needed for attainment. ARB staff prepared the WOE, which is provided in Appendix K of the 2016 Plan. WOE analyses include assessment of trends in ozone air quality, ozone precursor emission trends, meteorology impacts on ozone air quality trends, and summary of corroborating analyses. The WOE indicates that Ventura County is on track to attain the 75 ppb 8-hour ozone standard by 2020, which is consistent with design value projections derived from the regional photochemical modeling assessment conducted by South Coast AQMD.

#### **IV. CONTROL STRATEGY**

The ongoing emission reductions from continued implementation of ARB and District control strategies developed to meet prior standards provide the attainment control strategy for the 2016 Plan. The following sections highlight ongoing ARB control programs and District measures that provide the emission reductions included in the attainment demonstration.

##### **A. ARB Control Program**

Given the severity of California's air quality challenges, ARB has implemented the most stringent mobile source emissions control program in the nation. ARB's comprehensive strategy to reduce emissions from mobile sources consists of emissions standards for new vehicles, in-use programs to reduce emissions from existing vehicle and equipment fleets, cleaner fuels, and incentive programs to accelerate the penetration of the cleanest vehicles beyond that achieved by regulations alone. A detailed description of

the mobile source control programs and a comprehensive list of ARB regulations are included in Appendices C and D of the 2016 Plan.

## B. District Control Program

Consistent with its regulatory authority, the District has adopted rules for reducing emission from a broad scope of stationary and area sources. Table 3 highlights the District’s stationary source rules that achieve emission reductions in 2012 and beyond.

**Table 3. Adopted District Rules Achieving Emission Reductions**

District Rule	Date Adopted or Last Amended
74.11 Natural Gas-Fired Water Heaters	5/11/10
74.11.1 Boilers, Steam Generator, Heaters <1MMBtu	9/11/12
74.13 Aerospace Assembly and Component Manufacturing Operations	9/11/12
74.15.1 Boilers, Steam Generators, Heaters 1-2 MMBtu (2012)	9/11/12
74.15.1 Boilers, Steam Generators and Process Heaters 2-5 MMBtu	6/23/15
74.20 Adhesives and Sealants	9/11/12
74.22 Natural Gas-Fired, Fan-Type Central Furnaces	11/9/93
74.24 Marine Coating Operations	9/11/12
74.31 Metal Working Fluids and Direct-Contact Lubricants	11/12/13
74.33 Liquefied Petroleum Gas Transfer or Dispensing	1/13/15

Source: 2016 Plan, Table 3-1: *Stationary Source Control Measures – Local Measures Only*

### 1. Additional District Measures

As part of the 2016 Plan, the District has recommended a list of new stationary source control measures. The new measures are either a revision to an existing District rule or a new rule applicable to a previously unregulated source category and will provide additional emission reductions beyond those in the attainment demonstration.

#### Rule 74.2 Architectural Coatings (Proposed Rule Adoption 2017)

This new control measure would reduce ROG emissions from architectural coatings through revisions to Rule 74.2, *Architectural Coatings*. The South Coast Air Quality Management District (SCAQMD) has revised its Rule 1113, *Architectural Coatings*, applicable to similar sources, three times since the District last revised Rule 74.2 in 2010. The revisions to SCAQMD Rule 1113 include lowering reactive organic compounds content limits on several classes of coatings and imposing reactive organic compounds content limits on coating colorants.

#### Rule 74.32 Composting and Organic Material Conversion Operations (Proposed Rule Adoption 2017)

This control measure would implement new District Rule 74.32, Composting and Organic Material Conversion Operations, to incorporate requirements similar to SCAQMD Rules 1133.1, *Chipping and Grinding Activities*, and 1133.3, *Emission Reductions from Greenwaste Composting Operations*. The purpose of this control measure is to minimize ROG emissions through inadvertent decomposition during chipping and grinding activities (as Rule 1133.1) and during greenwaste composting operations (as Rule 1133.3).

#### Rule 74.22 Fan-Type Central Furnaces (Proposed Rule Adoption 2019)

This control measure would reduce NO<sub>x</sub> emissions from fan-type central furnaces rated at less than 175,000 Btu per hour heat through revisions to District Rule 74.22, *Natural Gas Fan-Type Central Furnaces*. SCAQMD revised its Rule 1111, *NO<sub>x</sub> Emissions from Natural Gas-Fired, Fan-Typed Central Furnaces*, applicable to similar source equipment, on November 6, 2009, reducing NO<sub>x</sub> limit from 40 nanograms per joule (ng/j) to 14 ng/j.

#### 74.34 NO<sub>x</sub> Reductions from Miscellaneous Sources (Adopted December 13, 2016)

This control measure is a new rule to minimize NO<sub>x</sub> emissions from a variety of sources not currently regulated. The emission standards would be similar to SCAQMD Rule 1147, *NO<sub>x</sub> Reductions from Miscellaneous Sources*. The applicability threshold of 5 MMBtu/hour heat input is based on San Joaquin Valley Air Pollution Control District Rule 4309, *Dryers, Dehydrators, and Ovens*. Restricting the applicability of the emission limits to larger sources increases the cost-effectiveness of the proposed rule.

## **V. CLEAN AIR ACT REQUIREMENTS**

In addition to the elements related to the attainment demonstration, the Act also requires SIPs for Serious ozone nonattainment areas to address the following elements:

- Base year emission inventories and future year forecasts for manmade sources of ozone precursors;
- Demonstration that control measures meet reasonably available control measures (RACM) level;
- Provisions that demonstrate reasonable further progress (RFP);
- Provisions for sufficient contingency measures for RFP and attainment; and
- Transportation conformity emission budgets to ensure transportation projects are consistent with the SIP.

## A. Emission Inventory

An emissions inventory is a critical tool used to evaluate, control, and mitigate air pollution. At its core, an emissions inventory is a systematic listing of the sources of air pollutants along with the amount of pollutants emitted from each source or category over a given time period. The planning emissions inventory is divided into three major categories: stationary, area-wide, and mobile sources. The summer season inventory is used for ozone planning because it reflects the activity levels and conditions presented when higher zone levels occur in the Southern California region.

California's 2016 SIP updates use a 2012 baseline inventory; the inventory uses 2012 emissions and activity levels, and inventories for other years are back-cast or forecast from that base inventory. The inventories reflect District rules submitted through November 2016. The 2016 Plan in Chapter 4 and Appendix A presents a summary of the data sources, along with revisions and improvements made to the emission inventory.

On-road motor vehicle emissions were generated using ARB's mobile source emissions model, EMFAC2014. On-road motor vehicle activity data reflect projections provided by SCAG in April 2016. Off-road mobile source emissions were generated using ARB's OFFROAD model. Both models were developed for use in the 2016 SIP revisions, and represent significant improvements over models used in prior SIP updates.

Mobile sources comprise the majority of Ventura County's NO<sub>x</sub> inventory, with ocean going vessels and on-road mobile sources the two largest sources (Table 4). Both mobile and area sources are currently significant contributors to the ROG inventory, however as ROG emissions from mobile sources are projected to decline, area sources are becoming an increasingly significant portion of the ROG inventory (Table 5).

**Table 4. Ventura County NOx Emissions**  
(tpd, summer planning inventory)

Source Category	2012	2020
Ocean Going Vessels	14	13
Heavy-Duty Diesel Trucks	6	4
Passenger Vehicles	6	2
Commercial Harbor Craft	3	3
Farm Equipment (Combines and Tractors)	2	2
Off-Road Equipment (Other)	2	1
Off-Road Equipment (Construction and Mining)	1	1
Residential Fuel Combustion	1	1
Service and Commercial	1	1
Recreational Boats	1	0
<b>Total of Top 10</b>	<b>37</b>	<b>28</b>
<b>Total Ventura County APCD</b>	<b>41</b>	<b>31</b>
<b>Top 10 As Percent of Total Emissions</b>	<b>92%</b>	<b>89%</b>

Source: 2016 Plan, Appendix A: *Ventura County Emissions Inventory Documentation*  
Numbers may not add due to rounding and Top 10 categories are prioritized by 2012 emissions

**Table 5. Ventura County ROG Emissions**  
(tpd, summer planning inventory)

Source Category	2012	2020
Passenger Vehicles	7	3
Consumer Products	5	5
Pesticides	3	2
Recreational Boats	3	2
Architectural Coatings and Related Process Solvents	2	2
Off-Road Equipment (Lawn and Garden)	2	2
Degreasing	2	2
Petroleum Marketing	1	1
Oil and Gas Production	1	1
Coatings and Related Process Solvents	1	1
<b>Total of Top 10</b>	<b>28</b>	<b>22</b>
<b>Total Ventura County APCD</b>	<b>38</b>	<b>32</b>
<b>Top 10 As Percent of Total Emissions</b>	<b>75%</b>	<b>69%</b>

Source: 2016 Plan, Appendix A: *Ventura County Emissions Inventory Documentation*  
Numbers may not add due to rounding and Top 10 categories are prioritized by 2012 emissions

Federal New Source Review (NSR) rules require new and modified major stationary sources that increase emissions in amounts exceeding specified thresholds to provide emission reduction offsets to mitigate the emission growth. Emission reduction offsets represent either on-site emission reductions or the use of banked emission reduction credits (ERC). ERCs are voluntary, surplus emission reductions, which are registered, or banked, with the District for future use as offsets.

Per U.S. EPA policy, ERCs banked before the plan’s emission inventory base year (2012 for this plan) must be explicitly treated as emissions in the air. Table 6, shows the ERCs registered with the District for future use as offsets. Further detail on ERCs is provided in Chapter 4 on page 66 of the 2016 Plan.

**Table 6. Ventura County Emission Reduction Credits (ERC) Balance as of January 2012**  
(tpd)

Pollutant	ERC Total
<b>NOx</b>	0.82
<b>ROG</b>	1.72

Source: 2016 Plan, Chapter 4: *Emissions Inventory Forecasts*

The Act requires ozone nonattainment areas to have an Emissions Statement program that mandates stationary sources with emissions over 25 tons per year of NOx or ROG report and certify the accuracy of NOx and ROG emissions annually. District Rule 24, *Source Recordkeeping, Reporting and Emission Statement, Section C, Emissions Statement*, addresses this requirement as stated on page 16 of the 2016 Plan.

#### B. Reasonably Available Control Measures Demonstration

As specified in the Act, the SIP shall provide for the implementation of RACM as expeditiously as practicable to provide for attainment of the ozone standard. RACM must also include emission reductions from existing sources that may be obtained through the adoption, at a minimum, of reasonably available control technology (RACT). The U.S. EPA has interpreted RACM as those emission control measures that are technologically and economically feasible and when considered in aggregate, would advance the attainment date by at least one year. The 2016 Plan contains a RACM analysis that demonstrates no new measures were identified that would advance attainment from 2020 to 2019. These analyses are further described in Chapter 3, Appendix E, Appendix F, and Appendix G of the 2016 Plan. The District submitted the required RACT SIP to U.S. EPA in 2014 as discussed in Chapter 3 of the 2016 Plan.

#### C. Reasonable Further Progress Demonstration

The Act and the Implementation Rule specify that each ozone nonattainment area must demonstrate ongoing emission reductions relative to the base year (2012). Federal law requires a three percent per year reduction in ROG emissions. Where both ROG and NOx emissions have been shown to contribute to high ozone levels, the Act allows NOx emission reductions to augment ROG emission reductions in order to demonstrate RFP.

The 2016 Plan includes an RFP demonstration that meets the Act’s requirements. The analysis indicates that the adopted measures from ARB’s mobile source program will provide emissions reductions beyond those needed for Ventura County’s RFP

demonstration. As discussed below, an additional three percent of NOx reductions for ROG substitution are set aside for RFP contingency purposes. Further information on the RFP demonstration can be found in Chapter 6 of the 2016 Plan.

#### D. Contingency Measures

Contingency measures provide additional emission reductions in the event a nonattainment area fails to achieve RFP targets or attain the ozone standard by its attainment date. These reductions are additional, since they are reductions not accounted for in the attainment demonstration. U.S. EPA has interpreted this requirement to represent one year’s worth of RFP, which amounts to three percent reductions from measures that are already in place or that would take effect without further rulemaking action.

The RFP demonstration in the 2016 Plan shows the District meets RFP milestone year contingency requirements. The three percent contingency was secured by the first milestone year (2018) and carried through to the attainment year (2020) by emission reductions from state and local control measures.

To meet the three percent emission reduction for attainment contingency, the 2016 Plan relies on additional reductions occurring between 2020 and 2021 from continued implementation of the control program, including the turnover in the mobile source fleet. ARB’s ongoing mobile source control program will provide emission reductions beyond Ventura County’s 2020 attainment year as newer vehicles enter the fleet due to continued implementation of the mobile source programs. The 2016 Plan relies on these continuing emission reductions to fulfill the contingency requirements should Ventura County fail to attain the ozone NAAQS in 2020, as shown below in Table 7.

**Table 7. Ventura County Mobile Source Emissions**  
(tpd)

Source Category	NOx			ROG		
	2020	2021	2022	2020	2021	2022
<b>On-Road Mobile</b>	6	5	5	4	4	4
<b>Off-Road Mobile</b>	22	22	21	8	8	8
<b>Total</b>	28	27	26	12	12	12

Source: 2016 Plan, Appendix A: *Ventura County Emissions Inventory Documentation*  
Numbers may not add up due to rounding

#### E. Transportation Conformity Budgets

Under section 176(c) of the Act, transportation plans, programs, and projects that receive federal funding or approval must be fully consistent with the SIP before being approved by a Metropolitan Planning Organization (MPO). U.S. EPA’s transportation



conformity rule<sup>6</sup> details requirements for establishing motor vehicle emission budgets (budgets) in SIPs for the purpose of ensuring the conformity of transportation plans and programs with the SIP.

The 2016 Plan establishes county-level on-road motor vehicle emission budgets for each RFP milestone year, as well as for the attainment year. Table 8 summarizes the motor vehicle emissions budget for transportation conformity purposes under a Serious federal 8-hour ozone classification. The emission budgets will apply to all subsequent transportation conformity years, per the federal transportation conformity regulation. Emission budgets for NOx and ROG were calculated using EMFAC2014 and reflect summer average emissions. Once U.S. EPA approves the emission budgets established in the 2016 Plan, it will serve as the conformity emissions budgets for future transportation conformity determinations in Ventura County. Additional details on the on-road motor vehicle emission budgets can be found in Chapter 3 on page 50 of the 2016 Plan.

**Table 8. On-Road Motor Vehicle Emission Budgets**  
(tpd, summer planning inventory)

	2018		2020	
Ventura	ROG	NOx	ROG	NOx
<b>Baseline Emissions</b>	4.90	7.29	4.21	6.01
<b>Safety Margin</b>	.50			
<b>Total</b>	5.40	7.29	4.21	6.01
<b>Conformity Budget</b>	6	8	5	7

Source: 2016 Plan, Table 3-7: Motor Vehicle Emissions Budget

## VI. ENVIRONMENTAL IMPACTS

The California Environmental Quality Act (CEQA) requires that State and local agency projects be assessed for potential environmental impacts. An air quality plan is a “project” that is potentially subject to CEQA requirements. The District found that the 2016 Plan will not result in any potentially significant adverse effects on the environment and is exempt from CEQA under the provisions of section 15061 (b)(3) (the general rule that CEQA only applies to projects which have the potential for causing a significant effect on the environment) and section 15308 (actions taken by a regulatory agency for protection of the environment) of the CEQA Guidelines.

ARB has determined that its review and approval of the 2016 Plan submitted by the District for inclusion in the California State Implementation Plan (SIP) is a ministerial

<sup>6</sup> Federal transportation conformity regulations are found in 40 CFR Part 51, subpart T – Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Developed, Funded or Approved Under Title 23 U.S.C. of the Federal Transit Laws. Part 93, subpart A of this chapter was revised by the EPA in the August 15, 1997 Federal Register.

activity by ARB for purposes of CEQA (14 CCR § 15268). A “ministerial” decision is one that involves fixed standards or objective measurements, and the agency has no discretion to shape the activity in response to environmental concerns. (14 CCR § 15369; *San Diego Navy Broadway Complex Coalition v. City of San Diego* (2010) 185 Cal.App.4th 924, 934.)

ARB’s review of the 2016 Plan is limited to determining if it meets all the requirements of the Act. ARB is prohibited from approving it or changing it unless ARB finds that it does not comply with the Act (Health and Safety Code § 41650 and 41652). Since ARB lacks authority to not adopt the plan, or modify it, in response to environmental concerns raised through the CEQA process, ARB’s action on the plan is ministerial for purposes of CEQA.

## **VII. STAFF RECOMMENDATION**

ARB staff recommends that the Board:

1. Adopt the 2016 Plan, including the emission inventories, attainment demonstration, RACM demonstration, RFP demonstration, contingency measures, and transportation conformity budgets, as a revision to the California SIP.
2. Direct the Executive Officer to submit the 2016 Plan to U.S. EPA as a revision to the California SIP.



California Environmental Protection Agency

 **Air Resources Board**

1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812  
[www.arb.ca.gov](http://www.arb.ca.gov)