

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Contingency Measure Plan

Planning for Attainment of the 1997 80 ppb 8-Hour Ozone Standard in the South Coast Air Basin

December 2019

Deputy Executive Officer

Planning, Rule Development, and Area Sources
Philip M. Fine, Ph.D.

Assistant Deputy Executive Officer

Planning, Rule Development, and Area Sources
Sarah L. Rees, Ph.D.

Planning and Rules Manager

Planning, Rule Development, and Area Sources
Zorik Pirveysian

Authors:

Kalam Cheung, Ph.D. – Program Supervisor – South Coast AQMD
Sang-Mi Lee, Ph.D. – Program Supervisor – South Coast AQMD
Brian Choe – Program Supervisor – South Coast AQMD
Britney Gallivan – AQ Specialist – South Coast AQMD
Kelly Trainor Gamino – AQ Specialist – South Coast AQMD
Philip Crabbe III, Public Affairs Manager – South Coast AQMD
Carol Sutkus – Air Quality Planning Manager – CARB
Scott King, Ph.D. – Air Quality Pollution Specialist – CARB

Contributors:

Ian McMillan, Planning and Rules Manager – South Coast AQMD
Shah Dabirian, Ph.D., Program Supervisor – South Coast AQMD
Ryan Finseth, Ph.D., Air Quality Specialist – South Coast AQMD
Paul Stroik, Ph.D., Air Quality Specialist – South Coast AQMD

Reviewed by:

Barbara Baird, Esq. – Chief Deputy Counsel – South Coast AQMD
Megan Lorenz – Principal Deputy District Counsel – South Coast AQMD
Sylvia Vanderspek – Air Quality Planning Branch Chief – CARB
Kurt Karperos – Deputy Executive Officer – CARB

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EXECUTIVE SUMMARY

The South Coast Air Basin (Basin) has faced poor air quality dating back over eight decades. The first recognized episodes of photochemical smog (ozone) occurred in Los Angeles in the summer of 1943 with visibility reduced to only three blocks. With a booming industry and growing economy, the region continued to experience significant levels of air pollution. Increasing awareness of the impacts of air pollution on human health and the environment led to the development of air pollution control laws in California and at the federal level, culminating in the federal Clean Air Act (Act or CAA). As a result of California and federal requirements, aggressive air pollution control programs have been put in place that have drastically improved the air quality in the Basin despite significant increases in population and vehicles. Since the 1950s, the maximum levels of ozone have decreased by 75% while the population and the number of vehicles have increased by three and four fold, respectively. Incidents of Stage I smog alerts, which used to occur 100-120 times a year, have been eliminated. Ozone levels sufficient to trigger Stage II smog alerts levels have not occurred since the 1980s. Also, the National Ambient Air Quality Standards (NAAQS) for Carbon Monoxide (CO), Nitrogen Dioxide (NO₂) and Particulate Matter less than 10 microns (PM₁₀) have all been achieved in the Basin.

Because of these air quality challenges, the greater Los Angeles region has been at the forefront of air pollution science and research, low- and zero-emissions technology development, and innovative air quality regulations and programs. Significant advancements have been achieved in both stationary and mobile source control technologies for reducing emissions. Despite these efforts and the corresponding substantial improvements in air quality that we have achieved, the health of our residents continues to be seriously affected by the poor air quality. The region's unique topography and meteorology coupled with emissions from millions of vehicles and engines, including those associated with the thriving goods movement industry, continue to produce the worst ozone pollution in the nation. Further, new scientific information on the health impacts of air pollution has led to progressively more stringent ozone standards which present a significant challenge for the region to attain.

In 1997, U.S. EPA set a new health protective 8-hour ozone standard (standard) at 80 parts per billion (ppb), replacing the previous 1-hour ozone standard. U.S. EPA designated the Basin as Extreme nonattainment for this standard. In 2007, the South Coast AQMD's 2007 Air Quality Management Plan (AQMP) outlined a detailed path for the area to attain this standard by the CAA deadline of June 2024 (emission reductions must occur in 2023). As part of this attainment strategy, the 2007 AQMP relied on a provision in the Act, section 182(e)(5), that allows areas classified as Extreme nonattainment to include emissions reductions from measures that anticipate reductions from future advanced technologies. When this provision is relied upon to demonstrate attainment, the area must make an enforceable commitment to submit contingency measures to U.S. EPA three years before the reductions are needed to attain the standard. In this submittal, the State must demonstrate that the assumed reductions from future technology were

already achieved, or if not, the State must submit contingency measures capable of achieving the remaining emission reductions. This Contingency Measure Plan is intended to meet that requirement.

While ozone forms in the atmosphere from a photochemical reaction of NO_x and VOCs, NO_x is the key pollutant that must be controlled to reach attainment in our region. NO_x is typically formed as a byproduct of combustion processes – such as those in power plants, boilers, and engines. As we have implemented increasingly more stringent requirements on stationary sources to control NO_x emissions, emissions from mobile sources – such as trucks, locomotives, ships and planes – have grown to dominate NO_x emissions. Today, over 80% of the NO_x emissions in our region are from mobile sources. Figure ES-1 illustrates the great progress that California Air Resource Board (CARB) and South Coast AQMD have made in reducing NO_x emissions since the standard was set in 1997. Since that time, NO_x emissions have been reduced by 76% through CARB and South Coast AQMD’s regulations and programs.

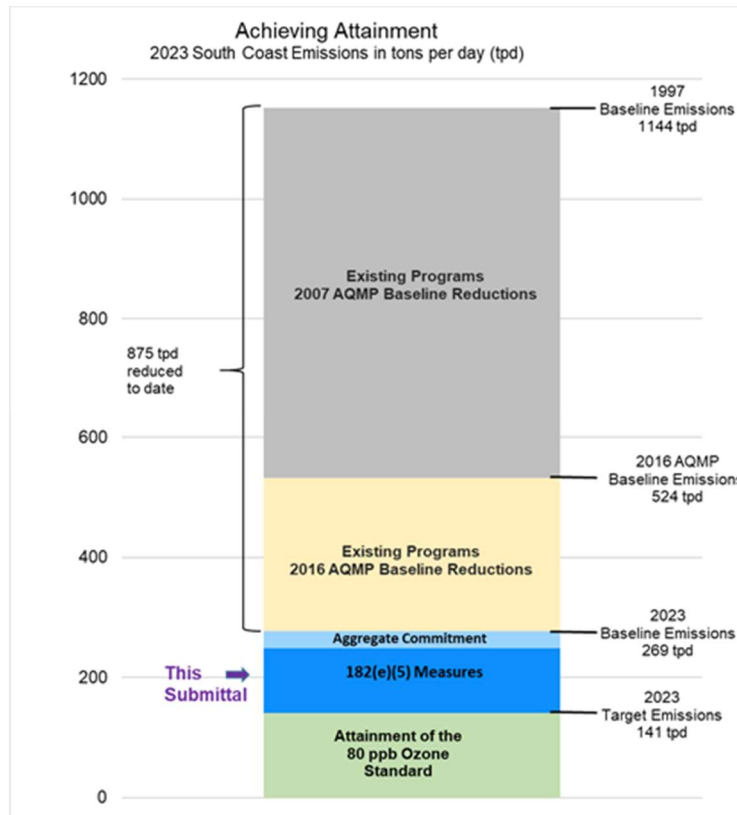


Figure ES-1: NO_x Emission Reductions, Commitments and Requirements in the South Coast Air Basin

In the 2016 AQMP, the South Coast AQMD updated its attainment demonstration to achieve the 1997 standard in 2023. While this new attainment demonstration still relies on the section 182(e)(5)'s future technology provision, the reductions needed from this provision are dramatically reduced – from 241 tons per day (tpd) NO_x in the 2007 AQMP, to 108 tpd of NO_x

in the 2016 AQMP. The 2007 AQMP's reliance on section 182(e)(5) was necessary at that time as new technologies were in their earliest stages of development, and some technologies were not yet foreseen. However, in the 2016 AQMP, the types of advanced technologies needed to achieve attainment were identified and were either already commercially available or were to be available by 2023. The main challenge was to rapidly turn over vehicle and engine fleets to these new technologies. An additional obstacle for California exists since many of the older vehicles and engines that need to be replaced are subject to federal, not state regulatory authority and therefore require federal action to provide these reductions. In Figure ES-1, the 108 tpd NO_x emissions reductions that are remaining for section 182(e)(5) provisions and which are addressed in this draft Contingency Measure Plan are represented by the darker blue section.

This draft Contingency Measure Plan represents a joint strategy by South Coast AQMD and CARB for achieving the 108 tpd of NO_x reductions allocated to section 182(e)(5) measures needed to attain the 1997 8-hour ozone standard. Achieving the standard by 2023 represents a tremendous challenge for the South Coast region - especially given the meteorological factors in the region conducive to poor air quality - and will require significant deployment of near-zero and zero-emission technologies and substantial levels of incentive funding to accelerate turnover to these cleaner technologies. While California and South Coast AQMD continue to implement their ongoing efforts, federal actions and measures are absolutely critical for meeting this standard. Without significant reductions from federal sources, we will be unable to attain the 1997 ozone standard in 2023.

The Contingency Measure Plan includes: 1) newly identified emission reduction strategies; 2) additional incentive funding to transition to the cleanest available technologies; and 3) significant federal action and/or funding to achieve the required reductions from sources under federal responsibility.

South Coast AQMD and CARB have Identified New Strategies

To develop this plan, CARB and the South Coast AQMD have re-evaluated the sources of emissions in the Basin and developed further strategies to reduce emissions. Those strategies are reflected in this document as newly identified strategies. There are two types of newly identified strategies: Identified Emission Reduction Strategies shown in Table ES-1, and Innovative New Measures listed in Table ES-2.

The Identified Emission Reductions Strategies represent a next round of regulations and programs that both agencies are working toward in implementing the 2016 AQMP. These are efforts that have been adopted or are soon-to-be-adopted since adoption of the 2016 AQMP, but for which emission reductions were not included in the 2016 AQMP. The Innovative New Measures represent the next step of pushing the envelope to achieve more reductions at the State level. CARB continues to seek out new and innovative opportunities for emission reductions.

Table ES-1: Identified Emission Reduction Strategies

Measures Description	Agency	NOx Reductions (tpd)
RECLAIM BARCT Rules	South Coast AQMD	2
Ports MOU	South Coast AQMD	3.2 – 5.2
Airports MOU	South Coast AQMD	0.5
Metrolink Locomotives	South Coast AQMD	3
Funding Incentives (Expected Future Funding)	South Coast AQMD	1.5
Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation	CARB	1.7
ATCM for Portable Engines, and the Statewide Portable Equipment Registration Program	CARB	0.25
HD Inspection and Maintenance (I/M) Program	CARB	4.2
Innovative New Measures	CARB	3.0
	South Coast AQMD Subtotal	10.2-12.2 tpd
	CARB Subtotal	9.15 tpd
	Total Reductions Towards 182(e)(5) Commitment*	24-26 tpd

* Estimated reductions including 4.2 tpd of reductions associated with updated OGV emissions inventory and CARB's SIP Strategy for OGV.

Table ES-2: CARB's Innovative New Measures

Measures	NOx Reductions (tpd)
Tier 5 Off-Road Diesel Engine Standard	3.0
State Green Contracting	
Reduction in Growth of Single-Occupancy Vehicle Travel	
Locomotive Emission Reduction Measure	
VMT and Land Conservation	
Regional VMT Reductions	
Co-benefits from Electrification of Buildings due to 2017 Climate Change Scoping Plan	

Additional Sources of Funding

Since the inception of the Carl Moyer Program over 20 years ago, over \$2 billion of incentive funding has been spent in the South Coast region to accelerate the introduction of cleaner mobile and stationary source technologies. The role of incentive funding has been critical to provide the appropriate market signals to advance the development of these cleaner technologies into full commercialization. Based on the analysis in the 2016 AQMP, over \$1 billion of additional incentive funding is required per year over 14 years to achieve the needed reductions to meet the ozone standards in the Basin in 2023 and 2031. Since the adoption of the 2016 AQMP, South Coast AQMD has been aggressively pursuing new sources of funding. These efforts have led to an approximate doubling of incentive funding, now roughly between \$200-300 million per year. However, this has not been enough to meet the 2016 AQMP funding goals, and several years have been lost. Based on South Coast AQMD’s preliminary analysis, an additional 15 tpd of NOx reductions could be achieved in 2023 from continuing efforts to secure additional funding.

A Call for Action

California and South Coast AQMD have pushed advances in clean technology, innovative regulations, and incentive programs to adopt the most comprehensive, aggressive, and successful strategy to reduce emissions from mobile sources in the nation. As a direct result of California’s programs, NOx emissions from those mobile sources under California’s authority have decreased by approximately 83 percent since 2000, as shown in Figure ES-2. California will be able to achieve a significant amount of the last portion of reductions needed to reach attainment in 2023. However, to achieve all of the reductions necessary to reach attainment, the State, South Coast AQMD and the federal government will need to work together with all stakeholders to drastically lower emissions to achieve the needed reductions.

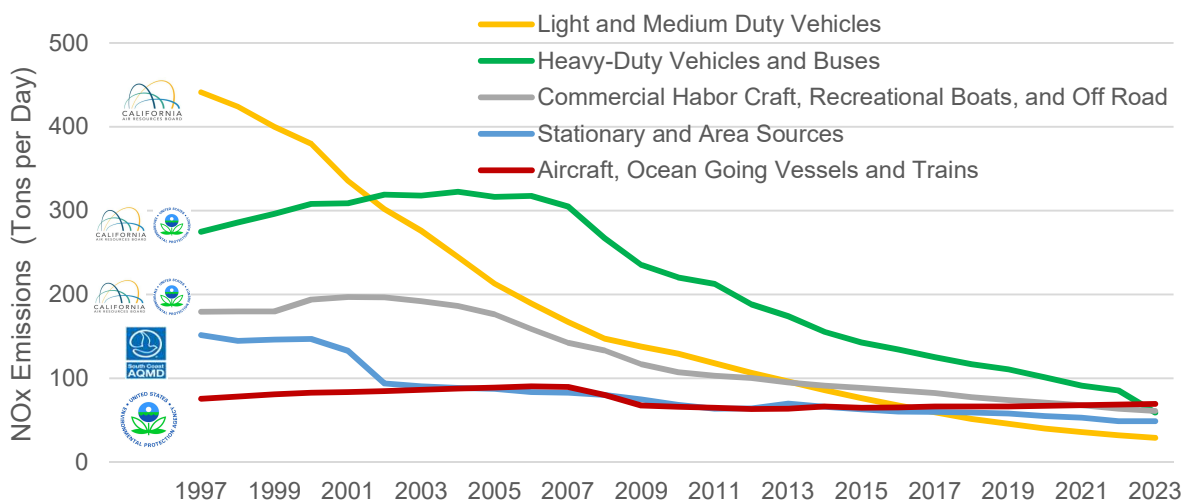


Figure ES-2: Progress in Reducing South Coast NOx Emissions by Agency

California relies on U.S. EPA to lower emissions from sources that the federal government alone has the authority to regulate. Historically, NOx emissions from federally regulated sources were a relatively small portion of the total NOx inventory. For example, in 2000, emissions from interstate trucks, aircraft, trains, ocean-going vessels, and some off-road engines together made up approximately 20 percent of California’s total NOx inventory. While California adopted programs to lower NOx emissions from the mobile sources under California’s control, U.S. EPA has not kept pace in reducing NOx emissions from sources under federal control. As a result, those same federal sources are today responsible for 33 percent of NOx emissions in the South Coast in 2019, and that percentage is projected to continue to rise. Similarly, while total NOx emissions have decreased in South Coast by nearly 70 percent from 1997, NOx emissions from federal sources outside of California’s control have only decreased by 15 percent since 1997, and are projected to increase in the future without federal action.

As California and the South Coast AQMD continue to pursue the cleanest technologies and adopt the most stringent regulations and programs in the nation, federal action is critical for meeting this standard. As Figure ES-2 shows, aircraft, ocean going vessels, and trains’ total emissions have been almost flat and will be slightly increased in the future. Absent federal action, these emissions will continue to increase, as shown in Figure ES-3. To the extent that U.S. EPA fails to act on federal sources that are beyond California’s regulatory control, California would need to achieve reductions from these sources through voluntary incentive programs. The funding needed to achieve the necessary reductions dramatically exceeds current resources. Given that these sources are under federal authority and thus, federal responsibility, significant levels of federal incentive funding to reduce emissions from federal sources, and/or federal regulatory actions to achieve the remaining level of reductions is necessary for attainment in 2023.

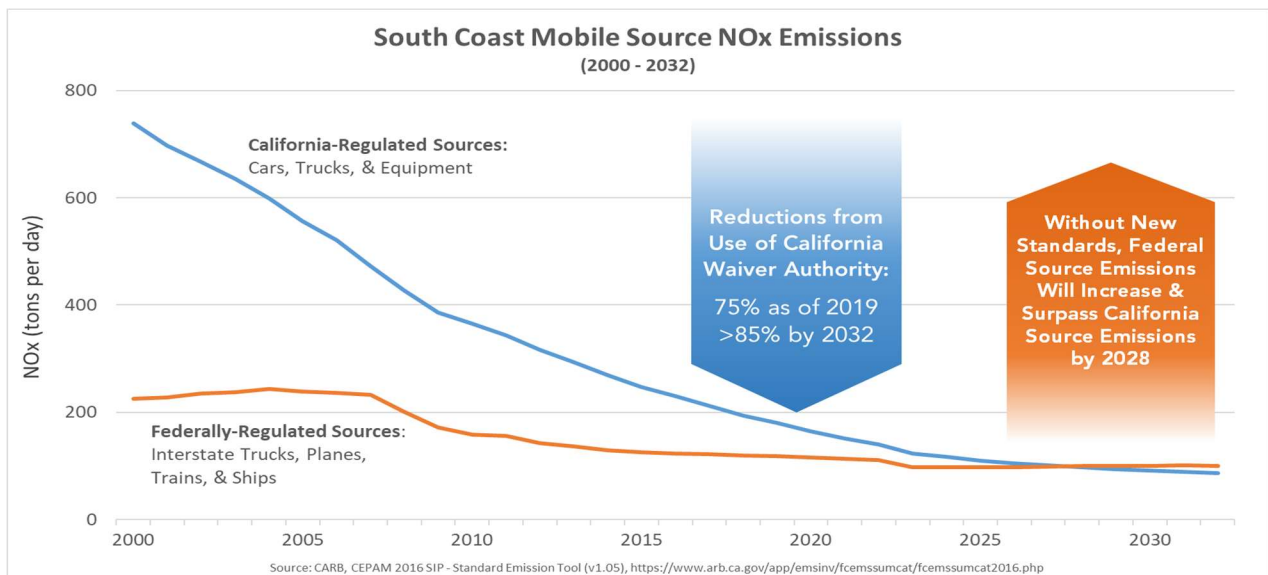


Figure ES-3: Federal Sources Overtake State Sources in the Future

1. BACKGROUND AND ACHIEVING ATTAINMENT OF THE 80 PPB STANDARD

a. Progress toward Attainment of the 1997 8-Hour Ozone Standard

In 1979, the U.S. EPA established primary and secondary national ambient air quality standards (NAAQS or standards) for ozone at 0.12 parts per million (ppm) averaged over a 1-hour period. The South Coast Air Basin was classified as an "extreme" nonattainment area¹ and, in 1990, was given an attainment deadline of November 15, 2010.

On July 18, 1997, the U.S. EPA revised the primary and secondary standards for ozone to 0.08 ppm, averaged over an 8-hour period ("1997 8-hour ozone standards"), and revoked the 1-hour ozone standard. U.S. EPA guidance on the revoked 1-hour ozone standard indicated that although the standard was revoked, certain planning requirements, known as anti-backsliding requirements, remained in effect. The Basin was classified as Severe 17 for the new 8-hour standard with an attainment date of June 2021. Due to challenges in attaining the 8-hour ozone standard, as permitted by the Clean Air Act, South Coast AQMD requested a voluntary re-designation of the Basin to "Extreme," with a new attainment date of June 15, 2024.

U.S. EPA revoked the 1997 8-hour ozone standard (0.08 ppm) in 2008, and promulgated the 2008 8-hour ozone NAAQS (0.075 ppm). Then in 2015, EPA revised the 8-hour standard to 0.070 ppm, effective December 2015. The South Coast Air Basin is classified as an Extreme nonattainment area for all three 8-hour ozone standards and has 20 years to attain each standard from the effective date of the final designation for each standard. Table 1-1 summarizes the attainment date and the attainment status for each of the federal ozone air quality standards for South Coast Air Basin.

Table 1-1
Attainment Status of the Federal Ozone Air Quality Standards of the South Coast Air Basin

Criteria Pollutant	Averaging Time	Designation	Attainment Date
Ozone (O ₃)	(1979) 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023
	(1997) 8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024
	(2008) 8-Hour (0.075 ppm)	Nonattainment (Extreme)	7/20/2032
	(2015) 8-Hour (0.070 ppm)	Nonattainment (Extreme)	8/3/2038

¹ U.S. EPA classifies ozone nonattainment areas in one of five different categories (marginal, moderate, serious, severe, and extreme) depending on how much the levels of ozone in the area exceed the standard. The "extreme" category is for the worst levels of ozone pollution.

Air quality in the South Coast Air Basin has improved significantly over many decades. Figure 1-1 shows the trend of the 8-hour ozone design value in the Basin from 1997 to 2018.² Consistent with the individual NAAQS, design values are typically used to designate and classify nonattainment areas, as well as to assess progress towards meeting the NAAQS. The 8-hour ozone design value is a three-year average of the 98th percentile highest value (4th highest daily maximum of 8-hour-average concentrations). While the ozone concentration in the Basin shows a steadily decreasing trend, year-to-year fluctuations are noticeable. This is mostly due to meteorological conditions, such as temperature, precipitation, and humidity, which affect the chemistry, mixing and transport of ozone and its chemical precursors. Global scale atmospheric dynamics such as El Nino or La Nina affect the Basin level air quality as well, since the global scale circulation patterns bring anomalous weather patterns such as above-average precipitation, stagnant conditions, or stronger subsidence that can either improve air quality or enhance pollution. The unusually high ozone concentrations observed in the 2016 to 2018 period were likely attributable to meteorological abnormalities that triggered excessive photochemical production of ozone and prolonged stagnation of air pollution. South Coast AQMD is currently conducting a study to analyze meteorological factors and trends to explain the poor air quality observed in the recent years despite continuing and demonstrable reductions in emissions.

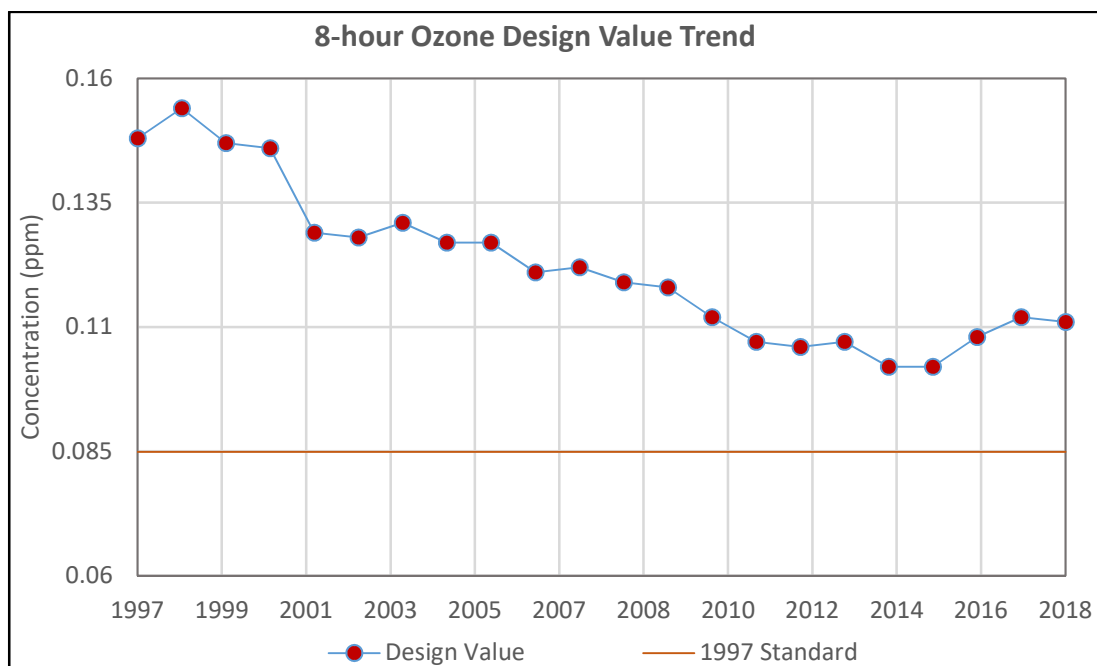


Figure 1-1
The 8-hour ozone design value in the South Coast Air Basin

² A design value is a statistic that describes the air quality status of a given location relative to the level of the NAAQS.

The progress in reducing ambient ozone concentrations is due to the reduction of ozone precursor pollutants in the past several decades. Ozone is a secondary air pollutant; ozone is not emitted directly from human activities or natural sources, but is chemically produced in the atmosphere. Emissions of NO_x and VOC react in the presence of ultraviolet light to form ozone. Figure 1-2 illustrates the Basin’s total emissions of NO_x and VOC from anthropogenic sources. NO_x and VOC emissions have decreased by 70% and 75%, respectively, from 1995 to 2018 and are expected to continue the trend in the future years due to continuing implementation of existing and upcoming regulations. Measured ambient nitrogen dioxide (NO₂) concentrations provide further evidence regarding the decrease in NO_x emissions. An analysis of monitoring data between 1995 and 2018 (Figure 1-3) indicates that ambient NO₂ levels have been reduced by over 60%, similar to the emission reductions indicated in Figure 1-2.

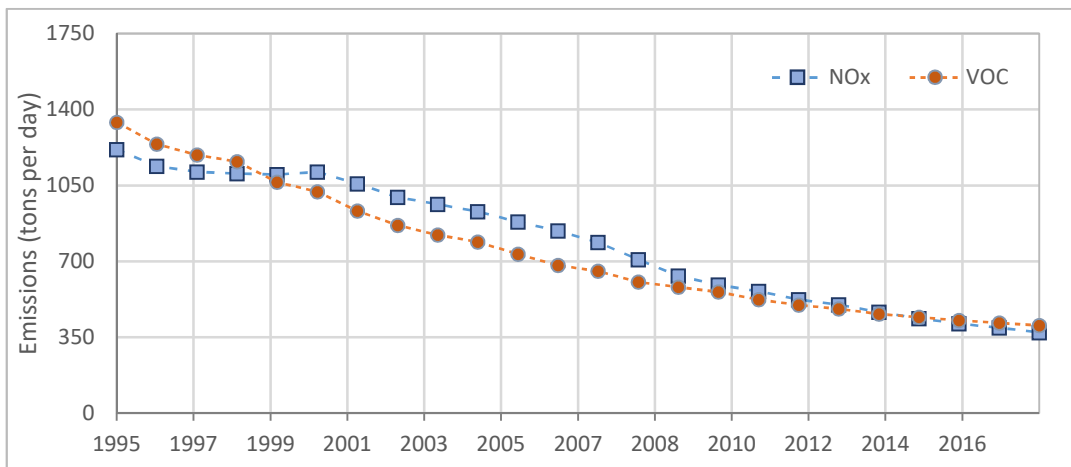


Figure 1-2
Basin Total NO_x and VOC emissions

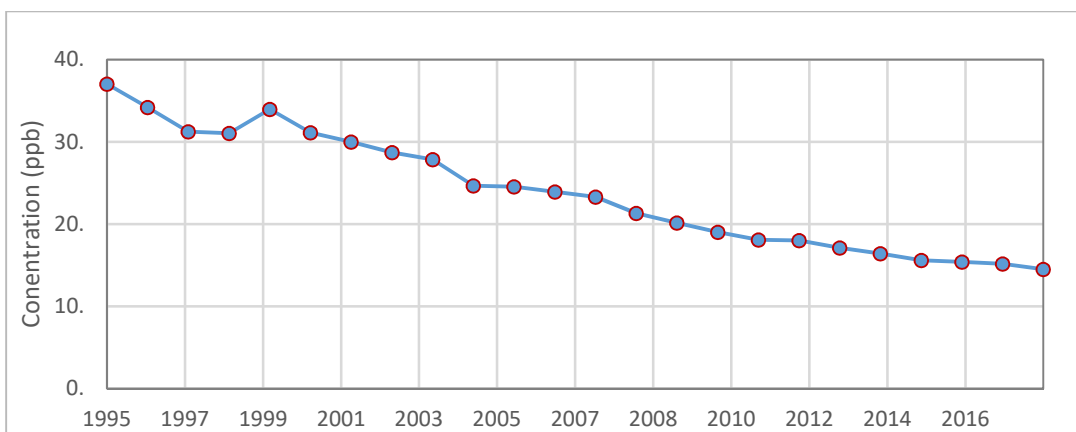


Figure 1-3
Annual average NO₂ concentrations in the South Coast Air Basin³

³ Seventy-five percent data completeness criteria was applied.

b. History of Air Quality Planning in the South Coast AQMD

The federal CAA requires areas that are not in attainment of the NAAQS to develop and implement emission reduction strategies that will bring the area into attainment by the required attainment dates. The Air Quality Management Plan (AQMP) is the regional blueprint for achieving air quality standards, and is designed to meet both federal and state CAA planning requirements. The AQMP is jointly developed by South Coast AQMD, CARB and Southern California Association of Governments (SCAG), and is submitted as part of the State Implementation Plan (SIP) to the U.S. EPA for evaluation and approval. The South Coast AQMD addressed attainment of the 1997 8-hour ozone standard of 80 ppb beginning in the 2007 AQMP, with updates provided subsequently in the 2012 and 2016 AQMPs.

i. Air Quality Management Plans

2007 AQMP

The CAA required that areas designated as nonattainment for the 1997 8-hour ozone standard submit a SIP to the U.S. EPA by June 15, 2007. The 2007 AQMP⁴ was developed in adherence with this provision and was the first South Coast SIP to address this standard. The 2007 AQMP control strategy consisted of four components: 1) the South Coast AQMD's Stationary and Mobile Source Control Measures, 2) CARB's Proposed Revised Draft State Strategy, 3) South Coast AQMD Policy Options to Supplement CARB's Control Strategy, and 4) Regional Transportation Strategy and Transportation Control Measures provided by SCAG. The magnitude of the NO_x emission reductions needed for attainment of the 1997 ozone NAAQS posed a significant challenge requiring an aggressive mobile source control strategy supplemented with focused and strategic stationary source control measures, and close collaboration with federal, state, and regional governments, businesses, and the public. Overall, the 2007 AQMP included 31 stationary and 30 mobile source measures. Based on the emission inventory and modeling analysis, the overall projected emission reductions needed to meet the 1997 8-hour ozone standard were 116 tpd of VOC and 383 tpd of NO_x in 2023. A summary of the 2007 AQMP summer planning emission inventory and reductions is provided in Table 1-2.

⁴ <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2007-air-quality-management-plan>

Table 1-2
2007 AQMP Emission Reductions for 2023 Based on
Summer Planning Inventory (tons per day)

Sources	VOC	NOx
Year 2023 Baseline¹	536	506
Baseline Adjustment ²	(0.2)	9
Emission Reductions:		
South Coast AQMD's Short-Term and Mid-Term Stationary Source Control Measures	19	9
South Coast AQMD Additional Mobile Source Control Measures	16	43
CARB's Revised Draft Proposed State Strategy	54	141
Long-Term Measures ³	27	190
Total Emission Reductions (All Measures):	116	383
2023 Remaining Emissions	420	114

¹ Emission assumptions from SCAG's 2004 Regional Transportation Plan are already reflected in the AQMP baseline.

² Reflects baseline inventory adjustments for CARB's adopted rules in 2006 for large spark-ignited engines (1.9 tpd NOx) and consumer products (4.8 tpd VOC), emissions for the purpose of set-aside tracking (5 tpd VOC increase) and emission benefits from Carl Moyer Program (6.2 tpd NOx) and NSR Program benefits (1.2 tpd NOx). Emission benefits from the Carl Moyer Program presented in this table reflect the additional reductions not included in the baseline. () denotes emission increases. See Appendix III of 2007 AQMP.

³ Includes long-term reductions from SCLTM-01A, SCLTM-01B, SCLTM-02 and SCLTM-03. Refer to Appendix IV-B-2 of 2007 AQMP.

The South Coast AQMD's short-term and mid-term control strategies for stationary and mobile sources were based on the following approaches: 1) facility modernization; 2) energy efficiency and conservation; 3) good management practices; 4) market incentives/compliance flexibility; 5) area source programs; 6) emission growth management; and 7) mobile source programs. The 2007 AQMP's long-term strategy built upon the long-term reductions associated with the implementation of short- and mid-term control measures or actions proposed by the South Coast AQMD, SCAG, and CARB. For achieving the remainder of the reductions needed for attainment, the long-term strategy primarily relied on long-term control measures based on new advanced technologies and control techniques or significant improvement of existing technologies which could not be specifically defined at the time. These long-term measures were pursuant to CAA section 182(e)(5), a provision that allows for reliance on emission reductions

from future technologies for extreme nonattainment areas. Because these future technologies have not yet been defined, these types of measures are often referred to as the “black box.” After implementation of the South Coast AQMD’s proposed measures and CARB’s State Strategy, reductions from long term measures were estimated to be 27 tpd of VOC and 190 tpd of NOx⁵, representing 43% of the overall combined VOC and NOx reductions needed for ozone attainment in 2023. Table 1-3 provides a list of some of the advanced technologies and innovative control approaches presented in the 2007 AQMP to achieve the long-term reductions needed for ozone attainment.

Table 1-3
2007 AQMP Possible Approaches for Long-Term Control Measures

Emission Category	Strategies
Light Duty Vehicles	<ul style="list-style-type: none"> ▪ Extensive retirement of high-emitting vehicles and accelerated penetration of PZEVs and ZEVs
On-Road Heavy Duty Vehicles	<ul style="list-style-type: none"> ▪ Expanded modernization and retrofit of heavy-duty trucks and buses ▪ Expanded inspection and maintenance program ▪ Advanced near-zero and zero-emitting cargo transportation technologies
Off-Road Vehicles	<ul style="list-style-type: none"> ▪ Expanded modernization and retrofit of off-road equipment
Fuels	<ul style="list-style-type: none"> ▪ More stringent gasoline and diesel specifications; Extensive use of diesel alternatives
Marine Vessels	<ul style="list-style-type: none"> ▪ More stringent emission standards and programs for new and existing ocean-going vessels and harbor craft
Locomotives	<ul style="list-style-type: none"> ▪ Advanced near-zero and zero emitting cargo transportation technologies
Pleasure Craft	<ul style="list-style-type: none"> ▪ Accelerated replacement and retrofit of high-emitting engines
Aircraft	<ul style="list-style-type: none"> ▪ More stringent emission standards for jet aircraft (engine standards, clean fuels, retrofit controls); Airport Bubble
Consumer Products	<ul style="list-style-type: none"> ▪ Ultra Low-VOC formulations; Reactivity-based controls
Renewable Energy	<ul style="list-style-type: none"> ▪ Accelerated use of renewable energy and development of hydrogen technology and infrastructure
AB32 Implementation	<ul style="list-style-type: none"> ▪ Concurrent criteria pollutant reduction technologies

⁵ A total of 241 tpd of NOx emission reductions were approved by U.S. EPA under section 182(e)(5) provisions

2012 AQMP

The 2012 AQMP was primarily developed to address the planning requirements of the 2006 24-hour PM_{2.5} standard, while providing some updates to the South Coast AQMD's commitments towards meeting the 1997 8-hour ozone NAAQS. The 2012 AQMP included a number of stationary source control measures covering coatings and solvents, combustion sources, petroleum operations, fugitive VOC emissions, multiple component sources, incentive programs, and educational programs; on-road mobile source measures focusing on light-, medium-, and heavy-duty vehicles; and measures to achieve further emission reductions from off-road mobile sources and off-road industrial equipment. Overall, the 2012 AQMP included 21 stationary and 17 mobile source ozone reduction measures. Based on the emissions inventory and modeling analysis in the 2012 AQMP, the overall projected emission reductions needed to meet the 8-hour ozone standard were 239 tpd of NO_x in 2023, compared to the total NO_x reductions of 383 tpd identified in the 2007 AQMP. The lower overall emission reductions requirements in 2012 AQMP were primarily due to implementation of South Coast AQMD and CARB measures which resulted in lower ozone levels in the base year, as well as an updated emissions inventory and modeling analysis.

Since the 2012 AQMP was developed primarily to address 24-hour PM_{2.5} and the federal PM nonattainment area provisions of CAA section 189 which do not allow for long-term measures, this plan did not provide any additional updates to the long-term measures of the 2007 AQMP that were provided in accordance with the federal ozone nonattainment area provisions of CAA section 182(e)(5). The 2012 AQMP did, however, indicate that since some of the major emission sources are already controlled by over 90%, attainment of the ozone standards would require broad deployment of zero- and near-zero emission technologies. The 2012 AQMP highlighted the significant amount of reductions needed to attain the federal ozone and PM standards and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal CAA.

2016 AQMP

The 2016 AQMP outlines the control strategies needed to attain the 2008 8-hour ozone standard (75 ppb) in 2031, the 2012 annual PM_{2.5} standard (12 µg/m³) in 2025, and the 2006 24-hour PM_{2.5} standard (35 µg/m³) in 2019, as well as providing an update on meeting the 1997 8-hour ozone standard (80 ppb) in 2023 and the 1979 1-hour ozone standard (120 ppb) in 2022. The 2016 AQMP's control strategy for attaining the 1997 and 2008 ozone standards in 2023 and 2031, respectively, included defined stationary and mobile source measures proposed by South Coast AQMD as well as CARB's state strategies including defined measures and section 182(e)(5) "Further Deployment of Cleaner Technologies" measures. South Coast AQMD's stationary source measures included 15 measures targeting stationary combustion sources,

petroleum operations and fugitive VOC emissions, coatings and solvents, multiple component sources, best available control measures, and co-benefits from energy and climate change programs. South Coast AQMD's 15 mobile source measures included South Coast AQMD's proposed facility-based mobile source measures (FBMSMs) and a number of incentive-based programs. The FBMSMs cover marine ports, commercial airports, railyards, warehouses and distribution centers, and new development and redevelopment, and are intended to reduce mobile source emissions associated with these types of facilities to help achieve the reductions attributed to CARB's Further Deployment measures. South Coast AQMD's proposed incentive measures cover both on-road vehicles and off-road equipment based on a variety of control technologies that are commercially available and/or technologically feasible to implement in the next several years. The focus of South Coast AQMD's mobile source measures includes accelerated retrofits or replacement of existing vehicles or equipment, acceleration of vehicle turnover through voluntary vehicle retirement programs, and greater use of cleaner fuels in the near-term. In addition, the South Coast AQMD has been implementing several incentive funding programs that have resulted in early emission reductions (e.g., the Carl Moyer Memorial Air Quality Standards Attainment Program, the Surplus Off-Road Opt-In for NOx (SOON) program, and Proposition 1B – Goods Movement Emissions Reduction Program). The continued implementation of these programs is expected to provide additional reductions toward attainment of the 1997 8-hour ozone standard in 2023.

The 2016 State SIP Strategy for the State Implementation Plan (State SIP Strategy) describes CARB's commitment to achieve the mobile source and consumer products reductions needed in the Basin. The State SIP Strategy identified the regulatory and programmatic approaches necessary to deploy cleaner technologies and fuels, and ensure sufficient penetration to meet air quality standards by deadlines established in the CAA. A majority of the reductions needed to meet the ozone standard in the Basin in 2023 will come from existing and proposed regulatory actions. This includes ongoing implementation of the existing control program, combined with proposed regulatory measures identified in the State SIP Strategy. New reductions were identified through two types of measures – defined measures that comprise an aggregate commitment for the State of five tons per day and measures to achieve further deployment of new technologies. The Further Deployment measures represent the remainder of the reductions needed, 108 tpd, and include incentive programs to further accelerate technology penetration in time to meet the standard, and further federal actions, including regulations, support for demonstration programs, and supporting policies to achieve reductions from sources under federal and international regulatory authority. Because these Further Deployment measures do not fit the definition of a defined SIP measure for U.S. EPA's approval purposes and because actions and resources from other agencies are required, these measures were envisioned to be approved under the provisions of section 182(e)(5).

Based on the modeling analysis conducted in the 2016 AQMP, NO_x reductions were determined to be the most effective control path for achieving the 1997 8-hour ozone standard in 2023. Figure 1-4 shows the ozone isopleths for Redlands, depicting the effect of reducing VOC and NO_x concentrations on ozone concentrations. As illustrated by the blue dot at the upper right corner, ozone levels would be above 95 ppb at the 2023 baseline emissions. As shown in Figure 1-4, to attain the 1997 8-hour ozone standard, reducing NO_x emissions (moving downward in the plot) is the most effective control path.

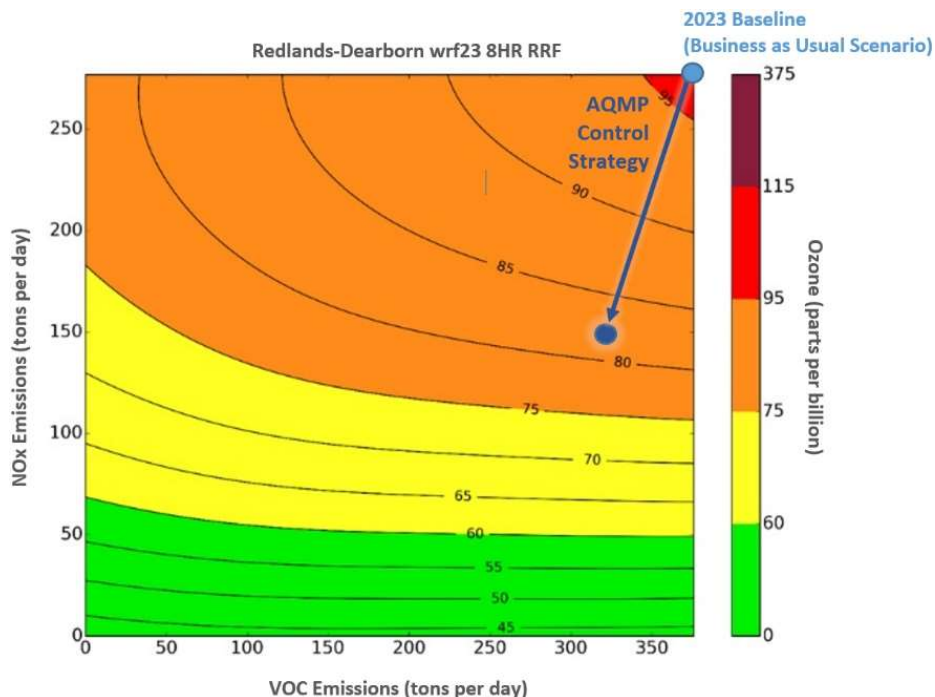


Figure 1-4
2016 AQMP NO_x Reductions, Most Efficient Control Path for Ozone Attainment

The attainment of 1997 8-hour ozone standard was demonstrated using NO_x and VOC emission reductions expected from the South Coast AQMD's control measures proposed in the 2016 AQMP and the CARB's control measures included in the 2016 State SIP strategy. According to the modeling in the 2016 AQMP, NO_x emission reductions is the primary pathway to reach attainment, and NO_x emissions will need to be reduced by an additional 45% in order to meet the standard by the 2023 attainment deadline. VOC emission reductions from limited VOC strategies and co-benefits from the NO_x strategies can also assist in attainment. VOC emission reductions reflected in the attainment demonstration can be grouped into four categories; reductions from South Coast AQMD's VOC measures, co-benefits from South Coast AQMD's NO_x measures, CARB's defined measures for NO_x and VOC, and co-benefits from CARB's Further Deployment of Cleaner Technology (i.e., 182(e)(5) measures). Table 1-4 summarizes VOC reductions associated with these four categories. The VOC emission reductions associated with the 182(e)(5) measures are approximately 40-41 TPD.

Table 1-4
VOC Emission Reductions Included in the 1997 Federal 8-hour Ozone Attainment Strategy

2023	VOC Emissions (tons per day)
Baseline	378.6
1997 8-hour Ozone Standard Attainment Demonstration	313.3 ⁺
Reductions from South Coast AQMD VOC measures	3 ⁺⁺
Co-benefits from South Coast AQMD NOx measures	10.2 [#]
Reductions from CARB Defined Measures	8.7-9.7 [*]
Reductions from CARB Further Deployment of Cleaner Technology	40-41 [*]

+ Remaining emission excluding SIP set-aside account

++ 2016 AQMP Table 4-2, FUG-01 and CTS-01

2016 AQMP Appendix V, Attachment 3

* 2016 State SIP strategy Table 4

While VOC emission reductions can assist in attainment, the 8-hour ozone attainment is more sensitive to NOx emission reductions than to VOC emission reductions. This is well illustrated in the ozone Empirical Kinetic Modeling Approach (EKMA) plot or so-called isopleths presented in the 2016 AQMP Appendix V Attachment 5. The ozone isopleths are developed based on numerous simulations of a comprehensive chemical transport model responding to various NOx and VOC emissions scenarios. The response of ozone to NOx and/or VOC reductions varies depending on the ratio of NOx to VOC and meteorological conditions, as the shape and contours of the isopleths change from location to location. Still, the isopleths provide a generalized platform to evaluate the efficacy of ozone strategy with respect to NOx and/or VOC reductions. The 2016 AQMP modeling analysis indicates that near the 80 ppb level, ozone is significantly more sensitive to NOx reductions than to VOC reductions.

During the implementation of NOx strategy, VOC co-benefits will inevitably occur. As an example, if an old gasoline vehicle is replaced with a new zero-emission vehicle, both VOC and NOx emissions are eliminated concurrently. The exact amount of concurrent VOC reductions will vary depending on vehicle categories impacted by a measure. Still, even if VOC emission reductions from the implementation of the section 182(e)(5) measures fall short of CARB's commitment of 40-41 tpd, NOx and concurrent VOC emission reductions from the commitment associated with implementation of the Contingency Measure Plan of South Coast AQMD and CARB are expected to ensure the attainment of the 1997 federal 8-hour ozone standard in the South Coast Air Basin. As a result, there is no need for submission of contingency measures for VOC reductions estimated for CARB's Further Deployment of Cleaner Technologies measures.

The magnitude of needed NOx emission reductions for attainment of the ozone NAAQS in 2023 represents a significant challenge for the whole region given the short remaining timeline. As most sources are already subject to the most stringent emissions controls in the world, attainment of the ozone standard will require broad deployment of zero and near-zero NOx emission technologies. Based on the emission inventory and modeling analysis, the carrying capacity - the maximum amount of emissions allowable in the region that would still meet the standard - is 141 tpd of NOx in 2023.⁶ A summary of the 2016 AQMP summer planning NOx emission inventory and reductions is provided in Table 1-5.

Table 1-5
2016 AQMP NOx Emission Reductions for 2023 Based on
Summer Planning Inventory (tons per day)

Sources	NOx
Year 2023 Baseline¹	269
Carrying Capacity	141
Total Emission Reductions (All Measures):	135
Defined Measures:	27
South Coast AQMD’s Stationary Source Control Measures	7
South Cost AQMD Additional Mobile Source Control Measures	16
CARB’s Defined Measures	4
Further Deployment of Cleaner Technologies	108
Set Aside Budget²	3
2023 Remaining Emissions	137³

¹ Reflects CARB’s 2018 Updates to the California State Implementation Plan (<https://ww3.arb.ca.gov/planning/sip/2018sipupdate/2018sipupdate.htm>).
² As SIP reserve for potential technology assessment and for general conformity purposes
³ Reflects an additional 4.2 tpd of NOx emission reductions beyond the projected carrying capacity of 141 tpd to accommodate changes in ocean-going vessel (OGV) emission inventory and CARB’s SIP strategy for OGV.

In 2023, mobile sources, which are under the state and federal jurisdiction, are responsible for 80% of NOx emissions while stationary sources, which are already subject to the most stringent requirements, account for the remaining 20% of NOx emissions. Therefore, the vast majority of NOx reductions needed for attainment have to come from mobile sources. As illustrated in Table 1-5, after implementation of the defined control measures by South Coast AQMD and CARB, an additional 108 tpd of NOx reductions are still needed to attain the 1997 ozone standard in 2023. These remaining reductions are expected to be achieved through Further Deployment of Cleaner Technologies measures for on-road heavy-duty vehicles, off-road equipment, and federal and

⁶ The carrying capacity is higher than the one predicted in the 2007 AQMP due to several factors including lower ozone levels in the base year of the 2016 AQMP, updated emission and modeling systems as well as EPA’s updated modeling guidance and methodology.

international sources. The “Further Deployment” measures include incentive programs, regulations to be developed as zero and near-zero emission vehicles and equipment are commercialized, South Coast AQMD’s FBMSMs, and the quantification of the emission reduction benefits from operational efficiency improvements and deployment of connected vehicles, autonomous vehicles, and intelligent transportation systems.

As indicated in the 2016 AQMP, significant amounts of incentive funding, in combination with regulatory actions, are needed to achieve the 1997 and 2008 ozone standards in the Basin. Based on the 2016 AQMP’s analysis, the amount of funding needed to achieve the NOx emission reductions associated with the “Further Deployment” measures proposed in the State Mobile Source Strategy and the 2016 AQMP is about \$1 billion per year beginning in 2017 over the next 14 years.

It is important to highlight the reduced reliance on control strategies approved under the provisions of CAA section 182(e)(5) for attainment of the 1997 8-hour ozone standard in the 2016 AQMP compared to the 2007 AQMP (Figure 1-5). In the 2007 AQMP, 241 tpd of NOx reductions were associated with measures approved by the U.S. EPA under section 182(e)(5). By the time the 2016 AQMP was adopted, the majority of the zero and near-zero technologies needed for attainment were already, or would soon be, commercially available. However, reliance on section 182(e)(5) in the 2016 AQMP was necessary, not because the technology was not yet identified, as was the case in the 2007 AQMP, but because of the difficulty in quickly turning the fleet over to this new technology given that many mobile source categories are under federal jurisdiction. Nevertheless, achieving the remaining 108 tpd of NOx by 2023 represents a very difficult challenge requiring new regulatory programs and a significant level of funding.

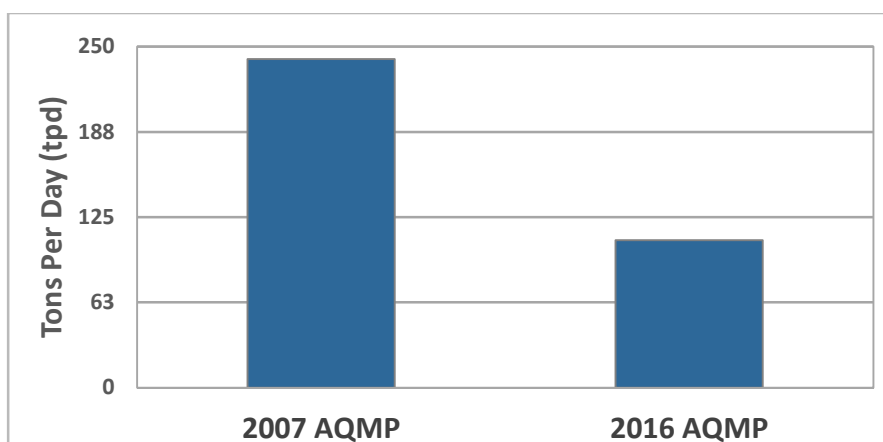


Figure 1-5
2007 AQMP vs. 2016 AQMP Reduced Reliance on Section 182(e)(5) Measures

Attainment of the 1997 8-hour ozone standard will require aggressive mobile source control strategies and incentive programs, supplemented by focused and strategic stationary source control measures, and expedited action by federal, state, and regional governments, businesses, and the public. Significant challenges remain in meeting the federal ozone standard. Ozone reduction strategies and programs need to be accelerated to ensure that the air basin will meet the 8-hour ozone standard by 2024.

ii. Evolution of the Mobile Source Program

Since the U.S. EPA set the 8-hour ozone standard in 1997, total NO_x emissions in the South Coast have been reduced by nearly 70% in 2019, and are projected to be reduced by 76 percent in 2023. A significant portion of these reductions came from mobile source programs. California's strategies to procure reductions from mobile sources have matured over the past decades as technology and science have progressed.

California's first vehicle exhaust standards were set in 1963, and vapor recovery from vehicle fueling stations followed soon after. Efforts in the 1980's focused on reducing emissions from passenger vehicles, as that represented a substantial portion of the ozone precursor emissions in the State's nonattainment areas. Light-duty vehicle programs such as the Smog Check and on-board diagnostics programs ensured that the control technology remained functional. The first Low-Emission Vehicle (LEV) regulations were adopted in 1990, requiring automobile manufacturers to introduce progressively cleaner light- and medium-duty vehicles with more durable emission controls and extended warranties for those controls from the 1994 through 2003 model years. By adopting these regulations, CARB established the most stringent criteria pollutant exhaust regulations ever for light- and medium-duty vehicles. Subsequent generations of the LEV regulations continued to reduce criteria pollutant emissions from new light- and medium-duty vehicles. In 2012, CARB adopted the LEV III regulations as part of the Advanced Clean Cars rulemaking package. The LEV III regulations included increasingly stringent emission standards for criteria pollutants and greenhouse gases for new passenger vehicles through the 2025 model year.

In the 1990s, emissions from trucks and other heavy-duty vehicles were increasing. At the same time, air quality modeling showed that strategies to reduce ozone should be targeting reductions in NO_x emissions. In an effort to address this, California focused on pollution control technology in heavy-duty vehicles by setting emission standards for new trucks and requiring cleaner burning diesel fuel. Small off-road equipment standards were also adopted. Cleaner generations of those new equipment standards were adopted over the next two decades. California also continued to regulate VOC emissions during the 1990s, adopting regulations to reduce VOCs from consumer products.

With California’s actions to establish stringent emissions standards for new light and heavy-duty vehicles, cleaner vehicles entering the fleet were replacing older, dirtier ones. California also created programs to ensure that pollution controls remained functional and that cars with excessive emissions were repaired or removed from the road. The Smog Check program required vehicle emissions to be tested regularly and the On-Board Diagnostic system required light-duty vehicles to monitor components that affect the performance of the vehicle emission controls.

To speed the transition to cleaner vehicles, the Carl Moyer incentive program was developed. This program focused on reducing NOx emissions by accelerating the turnover of older heavy-duty diesel vehicles and equipment to technologies that are cleaner than required by current regulations. Since its inception, the Carl Moyer Program has provided funding to incentivize the turnover of heavy-duty diesel engines and vehicles including on-road trucks, marine vessels, irrigation pumps, forklifts, and other off-road equipment. The table below highlights this program and the other significant California regulations and programs adopted in the 1980s and 1990s.

Table 1-6
Major State Regulations Adopted Between 1980 and 1999

Major Regulations Adopted Between 1980 and 1999	Implementation	Source
Vehicle Inspection and Maintenance program (Smog Check)	1984	Light-Duty Vehicles
On-Board Diagnostic	1988	Light-Duty Vehicles
Heavy-Duty Diesel NOx Standards	1990/96/98	Heavy-Duty Vehicles
Reformulated Gasoline	1992	Gasoline
Clean Diesel Fuel	1992	Diesel
Low-Emission Vehicle	1994	Light-Duty Vehicles
On-Board Diagnostic II	1996	Light-Duty Vehicles
Zero-Emission Vehicle program	1998	Light-Duty Vehicles
Carl Moyer Program	1998	Vehicles

In the 2000’s and 2010’s, California’s efforts focused on specific fleets that tended to remain in service longer and contained higher emitting vehicles compared to newer vehicles. A prominent example of this is the 2010 Truck and Bus Regulation which requires that all trucks in California meet 2010 Heavy-Duty Engine Standards by 2023. This all-encompassing regulation was

preceded by regulations targeting drayage trucks and solid waste collection vehicles that sped the turnover of those fleets.

Given the need to turn over the on-road fleets to cleaner vehicles faster than natural turnover would dictate, new incentive programs were created, such as the light-duty Clean Vehicle Rebate Program and the Heavy-Duty Proposition 1B Freight Program. In addition, the Carl Moyer Program was expanded in 2004 to fund a wider range of equipment, while maintaining the mandate that the funded vehicles and equipment must go beyond current regulatory requirements.

Table 1-7
Major State Regulations Adopted Since 2000

Major Regulations Adopted Since 2000	Implementation Begins	Source
School Zone Idling	2003	Heavy-Duty Vehicles
Heavy-Duty Diesel NOx Standards	2004/2007/2010	Heavy-Duty Vehicles
Commercial Vehicle Idling	2005	Heavy-Duty Vehicles
Public Agencies and Utilities Fleet	2006	Heavy-Duty Vehicles
Proposition 1B incentive program	2007	Heavy-Duty Vehicles
Solid Waste Collection Vehicles	2008	Heavy-Duty Vehicles
Clean Vehicle Rebate Project	2010	Light-Duty Vehicles
Drayage Truck Regulation	2010	Heavy-Duty Vehicles
Truck and Bus Regulation	2012	Heavy-Duty Vehicles
Enhanced Fleet Modernization Plus Up	2015	Light-Duty Vehicles
LEV III/ Alternative Clean Cars	2015	Light-Duty Vehicles

c. Emission Benefits from Existing Programs

i. Stationary Sources

South Coast AQMD first addressed the attainment of the 8-hour ozone standard of 80 ppb in the 2007 AQMP, with updates provided subsequently in the 2012 and 2016 AQMPs. Over the past fifteen years, ozone levels in the South Coast Air Basin have steadily decreased largely due to the implementation of emission control measures by the South Coast AQMD and CARB. The 2007 AQMP included 2023 baseline emissions of 506 tpd NOx and 536 tpd VOC, based on the summer planning inventory. With the implementation of the 2007 AQMP and 2012 AQMP control measures and the State SIP Strategy, the 2023 baseline emissions decreased to 269 tpd NOx in the

2016 AQMP. In other words, the 2023 projected emissions have been cut by almost half by the rules and regulations implemented in the last decade. This section summarizes the progress made in obtaining emission reductions from control measures from the 2007, 2012, and 2016 AQMPs, and describes how these existing programs assist in attaining the 1997 8-hour ozone standard.

Summary of 2007 AQMP Implementation

The 2007 AQMP was developed to address the CAA planning requirements for attaining the 1997 8-hour ozone standard and the 1997 annual PM_{2.5} standard. The 8-hour ozone control strategy built upon the PM_{2.5} strategy, augmented with additional NO_x and VOC reductions to meet the standard by the deadline in 2024 (emission reductions to occur in 2023). The ozone portion of the 2007 AQMP was approved by U.S. EPA into the SIP on March 1, 2012.⁷ The 2012 AQMP provided an update on the progress in implementing the 2007 AQMP. This progress can be measured by the number of control measures that have been adopted as rules and the resulting emission reductions. Between 2008 and 2011, twelve control measures or rules were adopted or amended by the South Coast AQMD. Table 1-8 lists the South Coast AQMD's 2007 AQMP commitments and the control measures or rules that were adopted through 2011. The emission reductions that were achieved in 2014 and will be achieved in 2023 through already adopted measures are based on the emissions inventories from the 2007 AQMP. As shown in Table 1-8, for the control measures adopted by the South Coast AQMD over this period, 22.5 tpd of VOC reductions and 7.6 tpd of NO_x reductions had been achieved by 2014. The 2023 projected emissions reductions associated with implementation of these measures are 26.3 tpd of VOC emissions and 10.3 tpd of NO_x emissions.

⁷ <https://www.federalregister.gov/documents/2012/03/01/2012-4673/approval-of-air-quality-implementation-plans-california-south-coast-attainment-plan-for-1997-8-hour>

Table 1-8
2007 AQMP Measures' Emission Reductions
for VOC and NOx (tons per day)

Control Measure #	Control Measure Title	Adoption Date	COMMITMENT (tpd)		ACHIEVED (tpd)	
			2014	2023	2014	2023
VOC EMISSIONS						
MOB-05	AB923 Light-Duty Vehicle High-Emitter Identification Program	On-going	0.8	0.7	--	--
MOB-06	AB923 Medium-Duty Vehicle High-Emitter Identification Program	On-going	0.5	0.6	--	--
FUG-04	Pipeline and Storage Tank Degassing - R1149	2008	NA	NA	0.04	0.04
BCM-03	Emission Reductions from Wood Burning Fireplaces and Wood Stoves	2008	NA	NA	0.44	0.70
MCS-01	Facility Modernization - R1110.2	2008+	2.0	9.2	0.3	0.3
CTS-01	Emission Reductions from Lubricants	2009	1.9	2.0	3.9	3.2
CTS-04	Emission Reductions from the Reduction of VOC Content of Consumer Products Not Regulated by the State Board -R1143	2009	NA	NA	9.7	10.1
MCS-04	Further Emission Reductions from Greenwaste Composting Operations - R1133.3	2011	NA	NA	0.88	0.88
MCS-07	Application of All Feasible Measures - R1113, R1177	2011	NA	NA	7.2	11.1
FLX-02	Petroleum Refinery Pilot Program	*	0.7	1.6	0	0
FUG-02	Emission Reductions from Gasoline Transfer and Dispensing Facilities	*	3.7	4.0	0	0

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MCS-05	Emission Reductions from Livestock Waste	*	0.8	0.6	0	0
EGM-01	Emission Reductions from New or Redevelopment Projects	**	NA	0.5	NA	--
TOTAL VOC REDUCTIONS			10.4	19.2	22.5	26.3
NO_x EMISSIONS						
MOB-05	AB923 Light-Duty Vehicle High-Emitter Identification Program	On-going	0.4	0.4	--	--
MOB-06	AB923 Medium-Duty Vehicle High-Emitter Identification Program	On-going	0.5	0.6	--	--
CMB-01	NO _x Reduction from Non RECLAIM Ovens, Dryers and Furnaces -R1147	2008	3.5	4.1	3.5	4.1
BCM-03	Emission Reductions from Wood Burning Fireplaces and Wood Stoves R445	2008	NA	NA	0.06	0.10
OFFRD-01	SOON Program	2008	4-8	NA	1.8	NA
MCS-01	Facility Modernization - R1110.2, PR1146, PR1146.1	2008+	1.6	2.2	2.17	3.15
CMB-03	Further NO _x Reductions from Space Heaters	2009	0.8	1.1	0.1	3.0
EGM-01	Emission Reductions from New or Redevelopment Projects	**	0	0.8	--	--
TOTAL NO_x REDUCTIONS			6.8	9.2	7.6	10.35

*SIP commitment for VOC reductions in the PM_{2.5} Plan was met via excess reductions achieved from CTS-04 (R1143).

**No SIP emission reduction commitment for the PM_{2.5} Plan. Rulemaking is delayed due to potential co-benefits of SB375 reduction targets.

Summary of 2012 AQMP Implementation

The 2012 AQMP was developed to set forth a comprehensive and integrated program that would bring the Basin into attainment of the federal 24-hour PM_{2.5} air quality standard, and to provide an update to the Basin's commitments towards meeting the federal 8-hour ozone standards. The Plan included updated and new control measures and commitments for emissions reductions for the 8-hour ozone attainment strategy and helped reduce reliance on the section 182(e)(5) long-term measures. The 2012 AQMP received a limited approval and limited disapproval by U.S. EPA on April 14, 2016.^{8,9} Table 1-9 lists the South Coast AQMD's 2012 AQMP commitments and the control measures or rules that were adopted through 2015. The emission reductions are quantified based on the emission inventories and milestone years from the 2012 AQMP. As shown in Table 1-9, for the control measures adopted by the South Coast AQMD over this period, 2.4 tpd of VOC reductions and 19.5 tpd of NO_x reductions, will be achieved by 2023.

⁸ <https://www.federalregister.gov/documents/2016/04/14/2016-08039/partial-approval-and-partial-disapproval-of-air-quality-state-implementation-plans-california-south>

⁹ The limited disapproval was based on the concerns that the 2010 RECLAIM program did not meet the Reasonably Available Control Measure, Reasonably Available Control Technology (RACM/RACT) requirement for certain sources of emissions, which was subsequently resolved in 2018. <https://www.federalregister.gov/documents/2018/02/12/2018-02677/air-quality-state-implementation-plans-approvals-and-promulgations-california-south-coast-moderate>

Table 1-9
2012 AQMP Measures' Emission Reductions
for NO_x and VOC (tons per day)

Control Measure #	Control Measure Title	Adoption Date	COMMITMENT		ACHIEVED	
			2014	2023	2014	2023
NO_x EMISSIONS						
OFFRD-01	Extension of the SOON Provision for Construction/Industrial Equipment	Ongoing	--	7.5	--	7.5
CMB-01	Further Reductions from RECLAIM [Regulation XX]	2015	2	3	0	12
CMB-02	NO _x Reduction from Biogas Flares	Rulemaking Underway	--	TBD	--	TBD
CMB-03	Reductions from Commercial Space Heating	2016	--	0.18	--	TBD
TOTAL NO_x REDUCTIONS			2	10.7	0	19.5
VOC EMISSIONS						
CTS-01	Further VOC Reductions from Architectural Coatings [R1113]	2016	--	2	--	1
CTS-02	Further Emission Reductions from Miscellaneous Coatings, Adhesives, Solvents and Lubricants	Rulemaking Underway	--	1	--	--
CTS-03	Further VOC Reduction from Mold Release Products [R1161]	Rulemaking Underway	--	0.8	--	--
FUG-01	VOC Reductions from Vacuum Trucks [R1188]	Rulemaking Underway	--	TBD	--	--
FUG-02	Emission Reduction from LPG Transfer and Dispensing [R1177]	Rulemaking Underway	--	1	--	--
FUG-03	Emission Reduction from Fugitive VOC Emissions	2016	--	1	--	--
MCS-01	Application of All Feasible Measure Assessment [R1114]	Ongoing	TBD	TBD	0.4	1.4
TOTAL VOC REDUCTIONS			0	5.8	0.4	2.4

Summary of 2016 AQMP Implementation

The 2016 AQMP is an integrated Plan designed to primarily address the 8-hour ozone NAAQS established in 2008, the annual PM_{2.5} NAAQS established in 2012, and the 24-hour PM_{2.5} NAAQS established in 2006 (2006 24-hour PM_{2.5}). Given the overlap in emissions and control strategies for other yet-to-be-attained NAAQS, the 2016 AQMP also provides an update on the control strategy for two other standards: the 1997 8-hour ozone NAAQS and the 1979 1-hour ozone NAAQS. Ozone measures include actions to reduce NO_x and VOC emissions from both stationary (point and area) and mobile sources. The mobile source measures include actions to be taken by the South Coast AQMD, CARB and the U.S. EPA.

Since the adoption of the 2016 AQMP, several rules have been developed and adopted as part of the implementation of the Plan. As noted in Table 1-10, one control measure commitment, CTS-01, was fulfilled with the October 2017 amendment to Rule 1168 – Adhesive and Sealant Applications, resulting in a VOC reduction of 1.4 tpd by 2023, exceeding the commitment of 1.0 tpd in the 2016 AQMP. Rule 1118.1 – Non-Refinery Flares, seeks to fulfill the purpose of CMB-03 and was adopted by the Governing Board in January 2019. Recently approved amendments to Rules 1134, 1135 and the 1146 series have assisted in achieving the goals of control measure CMB-05 to transition RECLAIM facilities into command and control. There are also a number of 2016 AQMP control measures for which development is currently under way, including Rules 1109.1, 1117, the 1147 series, 1150.3, and 1179.1, and continuing implementation of ongoing mobile source programs such as Surplus Off-Road Opt-In for NO_x (SOON), the extended exchange program, and incentive programs (e.g., Carl Moyer), for which reductions have not yet been completely quantified.

Three mobile source incentive measures with quantifiable NO_x emission reductions were included in the 2016 AQMP. They are MOB-10 (Extension of the SOON Provision for Construction/Industrial Equipment), MOB-11 (Extended Exchange Program), and MOB-14 (Emission Reductions from Incentive Programs), each with 2, 2.9 and 11 tpd of committed NO_x reductions, respectively, by 2023. MOB-14 recognizes the emission benefits from incentive funding programs such as the Carl Moyer Memorial Air Quality Standards Attainment Program and Proposition 1B such that the emission reductions from these programs can be accounted for in the SIP. To track the implementation of MOB-14, the emission reduction benefits for the incentive projects funded under Carl Moyer Program and Proposition 1B were quantified between 2013 and 2019 and were estimated to be 5.9 tpd in 2023. Given that the emission reductions from secured or reasonably anticipated funding for future Moyer projects are likely to continue to generate surplus emissions in 2023, it is anticipated that the aggregate commitments of 11 tpd under MOB-14 will be fulfilled.

Table 1-10
2016 AQMP Measures' Emission Reductions To Date
for VOC and NOx (tons per day)

Control Measure #	Control Measure Title	Adoption Date	COMMITMENT		ADOPTED TO BE ACHIEVED	
			2023	2031	2023	2031
VOC EMISSIONS						
CTS-01	Further Emission Reductions from Coatings, Solvents, Adhesives, and Sealants [R1168]	2017/2021	1.0	2.0	1.4	--
FUG-01	Improved Leak Detection and Repair	2019	2.0	2.0	--	--
CMB-01	Transition to Zero and Near-Zero Emission Technologies for Stationary Sources	2018	1.2	2.8	--	--
CMB-03	Emission Reductions from Non-Refinery Flares [R1118.1]	2018	0.4	0.4	0.014	--
ECC-02	Co-Benefits from Existing Residential and Commercial Building Energy Efficiency Measures	2018	0.07	0.3	--	--
ECC-03	Additional Enhancements in Reducing Existing Residential Building Energy Use	2018	0.2	0.3	--	--
BCM-10	Emission Reductions from Greenwaste Composting	2019	1.5	1.8	--	--
TOTAL VOC REDUCTIONS			6.4	9.6	1.4	--
NOx EMISSIONS						
CMB-01	Transition to Zero and Near-Zero Emission Technologies for Stationary Sources	2018	2.5	6.0	--	--
CMB-02	Emission Reductions from Replacement with Zero or Near-Zero NOx Appliances in Commercial and Residential Applications	2018	1.1	2.8	0.01	--
CMB-03	Emission Reductions from Non-Refinery Flares [R1118.1]	2018	1.4	1.5	0.2	--
CMB-04	Emission Reductions from Restaurant Burners and Residential Cooking	2018	0.8	1.6	--	--
CMB-05	Further NOx Reductions from RECLAIM Assessment [R1134, 1135, R1146 series]	2022	0.0	5.0	TBD*	--

ECC-02	Co-Benefits from Existing Residential and Commercial Building Energy Efficiency Measures	2018	0.3	1.1	0.3**	--
ECC-03	Additional Enhancements in Reducing Existing Residential Building Energy Use	2018	1.2	2.1	--	--
MOB-10	Extension of the SOON Provision for Construction/Industrial Equipment	Ongoing	1.9	1.9	TBD	TBD
MOB-11	Extended Exchange Program	Ongoing	2.9	1.0	TBD	TBD
MOB-14	Emission Reductions from Incentive Programs	Ongoing	11	7.8	5.9***	TBD
TOTAL NOx REDUCTIONS			23.1	31.0	6.4	TBD

**Emission reductions from Rules 1134, 1135 and 1146 series are used to account for the RECLAIM shave as amended in 2015. Part of these emission reductions resulting from non-RECLAIM facilities could be used to fulfill CMB-01 and CMB-02.*

*** A linear extrapolation was used to estimate emission reductions from ECC-02 which are co-benefits from the adoption of State policies, such as SB350 and Title 24.*

**** Estimated reductions through 2020.*

RECLAIM

The Regional Clean Air Incentives Market (RECLAIM) program, under South Coast AQMD's Regulation XX, was adopted in October 1993 and is a market-based emissions trading program designed to reduce NOx and SOx emissions. RECLAIM was designed to provide equivalent emission reductions in the aggregate for the facilities in the program compared to what would occur under a command-and-control approach, with flexibility for each facility to find the most cost-effective strategy to meet their emission reduction targets. The California Health and Safety Code requires the South Coast AQMD to implement Best Available Retrofit Control Technology (BARCT) in the RECLAIM program, as well as for other stationary sources, and if BARCT advances, the South Coast AQMD is required to periodically re-assess the overall program caps (i.e. overall allocation), and reduce the RECLAIM Trading Credit (RTC) holdings to a level equivalent to command-and-control BARCT levels. In December 2015, the South Coast AQMD Governing Board adopted a reduction of 12 tpd of RTCs over a seven-year period, from 2016 to 2022. With an allocation of 26.5 tpd of RTCs in 2015, the remaining allocation would be 14.5 tpd in 2023. Further, on March 3, 2017, the South Coast AQMD Governing Board adopted a 2016 AQMP NOx RECLAIM measure (CMB-05) to achieve 5 tpd of NOx emission reductions commitment as soon as feasible, and no later than 2025, and to transition the RECLAIM Program to a command-and-control regulatory structure requiring BARCT level controls as soon as practicable.

As specified in the staff report of the 2015 December RECLAIM amendment, a reduction of 12 tpd of RTCs is calculated based on the actual emissions reported by the RECLAIM facilities in

2011/2012, with adjustments to account for uncertainties that arose in the BARCT analysis and for additional 2011 activity level adjustments. The 2011/2012 baseline emissions for the NO_x RECLAIM universe were 20.7 tpd. With the implementation the 2015 RECLAIM amendment, the RTCs remaining in 2023 will be 14.5 tpd. Therefore, to account for the RECLAIM shave in the SIP, a reduction of 6.2 tpd of actual emissions (the difference between the actual emissions in 2011/2012 and the 2023 remaining potential emissions in the SIP emission inventory) was included in the baseline emissions for the 8-hour ozone attainment demonstration in the 2016 AQMP.

In order to accurately report on progress made toward achieving emission reduction commitments, reductions from RECLAIM BARCT rules are first allocated to account for the reduction specified under RECLAIM Rule 2002. Since the adoption of the 2016 AQMP, six rules (Rules 1110.2, 1134, 1135, 1146, 1146.1, and 1146.2) have been adopted or amended by the South Coast AQMD as part of the RECLAIM transition. The total emission reductions resulting from these six rules is 5.2 tpd. Furthermore, five additional rules (Rules 1117, 1147, 1147.1, 1147.2 and 1147.3) are currently under development and are scheduled for amendment / adoption in calendar year 2020. The emission reductions anticipated from these rule amendments /adoptions are estimated to be at least in the range of 0.5 tpd to 1 tpd, which will likely satisfy the baseline NO_x emission reductions commitments specified under RECLAIM Rule 2002. As the RECLAIM program transitions into a regulatory approach, the actual emissions from the RECLAIM universe will be tracked for emission reconciliation with the commitments in the SIP inventory. Additional reductions beyond this commitment due to these and other rulemaking activities (e.g., 1109.1) are discussed later.

The 2016 AQMP included new and innovative means to continue to make progress toward attaining the ozone standard. These included incentive programs, efficiency improvements, recognizing co-benefits from other programs, regulatory measures, and other voluntary actions. A key element of the 2016 AQMP is to make available private and public funding to help further the development and deployment of the advanced cleaner technologies such as zero emission and near-zero emission technologies, and co-benefits from existing programs (e.g., climate and energy efficiency). On January 4, 2019, the South Coast AQMD Governing Board awarded 27 emission reduction incentive projects, totaling over \$47 million from several South Coast AQMD mitigation and penalty funds, to support the 2016 AQMP's goals. Of the 27 projects, 16 are selected to implement commercially available zero or near-zero control technology as well as to support infrastructure for implementation of cleaner fuels. These projects are anticipated to result in approximately 88 tons per year of NO_x and 2 tons per year of PM_{2.5} emissions reductions in the Basin, with the majority of the projects in environmental justice communities. Additionally, 11 stationary and mobile source technology demonstration projects were funded. Upon successful demonstration and deployment, these projects have the potential to provide additional long term NO_x and VOC emission reductions. The awarded projects are consistent

with the commitments in various 2016 AQMP control measures including MOB-14, CMB-02, CMB-04, and ECC-03.

Table 1-11
South Coast AQMD Emission Reduction Allocation

	Rule	Adoption Date	NOx Reduction (tpd)
Adopted Rules in 2018 - 2019	Rule 1134 – Stationary Gas Turbines	4/5/2019	2.8
	Rule 1135 – Electricity Generating Facilities	11/2/2018	1.8
	Rule 1146, Rule 1146.1, Rule 1146.2 – Non-Refinery Boilers and Heaters	12/7/2018	0.3
	Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines	11/1/2019	0.3
Rules to be Adopted in 2020	Rule 1117 – Emissions of Oxides of Nitrogen from Glass Melting Furnaces	n/a	0.5 to 1
	Rule 1147 – Series NOx Reductions from Miscellaneous Sources		
	Rule 1147.1 – NOx Reductions from Large Miscellaneous Combustion		
	Rule 1147.2 – NOx Reductions from Metal Processing Equipment		
	Rule 1147.3 - NOx Reductions for Equipment at Aggregate Facilities		

ii. Mobile Sources

On-Going Mobile Source Regulations and Programs

CARB is implementing numerous regulations aimed at reducing NOx from light-duty on-road vehicles such as cars, heavy-duty on-road vehicles such as diesel trucks, and off-road sources like cargo handling equipment and large construction equipment. Phased implementation of these regulations continues to lower emissions from mobile sources and off-road equipment through 2023 and beyond, as newer vehicles and equipment are introduced with cleaner technologies, and replace the older and dirtier vehicles and equipment. In addition to regulations targeting vehicles and other combustion sources, as mentioned above, CARB is requiring cleaner fuels that provide for additional emission reductions in vehicles and equipment. NOx emissions from light-duty vehicles in the Basin have been reduced significantly over the past several

decades and will continue to go down after 2023 due to the benefits of CARB's longstanding light-duty mobile source program. Between 1997 and 2023, NO_x emission from light-duty sources have decreased by over 90 percent. Key light-duty programs include:

- Zero Emission Vehicle (ZEV) program that requires auto manufacturers to offer for sale specific numbers of the cleanest cars available;
- Reformulated Gasoline program that requires gasoline in California meet specifications for clean burning fuel;
- Smog Check Program that requires periodic inspections of the vehicle's emission controls, and repairs to controls that are not functioning properly;
- Low Emission Vehicle (LEV) and LEV II regulations that set engine standards for cars, sport utility vehicles, pick-up trucks and mini-vans;
- On-Board Diagnostics (OBD) and OBD II regulations requiring passenger cars, light-duty trucks, and medium-duty vehicles to be equipped with emission control diagnostic systems; and
- Advanced Clean Cars program that sets comprehensive standards for new vehicles in California through model year 2025.

NO_x emissions from heavy-duty vehicles in the Basin have been reduced significantly and will continue to be reduced beyond 2023 due to the benefits of CARB's heavy-duty mobile source program. Between 1997 and 2023, NO_x emissions from heavy-duty sources have decreased by 80 percent. Key heavy-duty programs for this source include:

- Stringent heavy-duty engine standards;
- CARB Clean and Cleaner Diesel programs that reduce emissions from all diesel vehicles and equipment;
- Regulations to limit idling in school buses and commercial vehicles;
- In-use regulations on specific fleets such as solid waste collection vehicles and drayage trucks; and
- Truck and Bus Regulation that requires all older trucks and buses to meet the 2010 engine emissions standards in 2023.

Off-road sources encompass equipment powered by an engine that does not operate on the road. Sources vary from ocean-going vessels to lawn and garden equipment and include locomotives, aircraft, tractors, harbor craft, off-road recreational vehicles, construction equipment, forklifts, and cargo handling equipment. NO_x emissions from off-road sources in the Basin have been reduced significantly and will continue to go down through 2023 due to the benefits of CARB and U.S. EPA programs. Between 1997 and 2023, NO_x emission from off-road sources have decreased by over 50 percent. Key off-road programs for these off-road sources include:

- Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation that requires operators of in-use fleets achieve tightening specific fleet emission standards;
- Small Off-Road Engines (SORE) program setting emissions standards for spark ignition engines rated at or below 19 kilowatts; and
- Regulations limiting emissions from specific off-road equipment such as cargo handling equipment and transportation refrigeration units.

To speed the delivery of the cleanest vehicles to the Basin, CARB and the South Coast AQMD have worked on identifying and distributing incentive funds needed to accelerate the cleanup of older vehicles. There are a number of incentive programs that have speeded the early turnover to clean vehicles and produced emission reductions beyond what could be achieved by new engine standards and natural turnover. Key incentive programs for mobile sources include:

- Clean Vehicle Rebate Project and Enhanced Fleet Modernization Program for light-duty vehicles;
- Carl Moyer Incentive Program and the Proposition 1B Incentive Program for on-road and off-road heavy-duty vehicles;
- Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project for on-road heavy-duty trucks and buses; and
- Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program for agricultural equipment.

State SIP Strategy Implementation

Since adopting the State SIP Strategy, CARB has been implementing the measures that were defined in the Strategy according to the schedule set forth in the aggregate commitment. Several of these measures have been adopted by CARB and are detailed in the table below. Other measures are in the development stage, either undergoing public workshops or being developed by CARB staff.

Table 1-12
2016 State SIP Strategy Aggregate Commitment Measures

Measure Title	Board date Adopting the Subsequent Rule
South Coast On-Road Heavy Duty Vehicle Incentive Measure	March 22, 2018
Heavy-Duty Diesel Vehicle Emission Control System Warranty Regulation Amendments	June 2018
Innovative Clean Transit Regulation	December 14, 2018
Zero-emission Airport Shuttle Regulation	June 1, 2019
Zero-Emission Powertrain Certification Regulation	June 1, 2019
Electric Vehicle Supply Equipment Standards	June 1, 2019
Ocean-Going Vessel At Berth And At Anchor Regulation	Scheduled December 2019

d. Clean Air Act Section 182(e)(5) Contingency Measure Requirements

Section 182(e)(5) of the Act allows Extreme ozone nonattainment areas to include emission reductions in their attainment strategy from the anticipated development of new control techniques or the improvement of existing control technologies. These advanced technology measures are generally undefined at the time the SIP is adopted and submitted to U.S. EPA. Areas with SIPs that rely on such provisions must submit a SIP revision three years prior to the attainment year to demonstrate that the area will achieve the reductions assigned to the new technology by the attainment date, or include contingency measures to be implemented if the anticipated technologies do not achieve the planned reductions.

These contingency measures must be adequate to produce emission reductions sufficient, in conjunction with other plan provisions, to demonstrate reasonable further progress and attainment by the applicable dates. If the area fails to achieve the emission reductions due to an inability to fully implement the advanced technology provisions, U.S. EPA shall require the State to implement the contingency measures to the extent necessary.

While most of the reductions needed for attainment will come from existing control programs, California relied on these advanced technology provisions to achieve the additional increment of reductions needed to demonstrate attainment of the standard. In its 2016 State SIP Strategy CARB outlined those measures proposed for approval under section 182(e)(5). The advanced technology measures required this future flexibility in the approval process because some of the measures relied on the expenditure of future funding to achieve the pace of clean technology deployment needed. While the vehicle fleet would naturally turn over to zero- and near zero-emission technologies, the pace at which natural turnover takes place is not sufficient to meet California's emission reduction needs. In addition, flexibility was needed because significant

actions by federal and international agencies are needed to reduce those emissions from sources subject to federal regulatory authority that California lacks the authority to regulate.

Whereas 66 percent of the emissions reductions needed for attainment will be achieved from baseline measures that were adopted prior to adoption of the 2016 AQMP, the remaining emissions reductions will be achieved through the two types of measures listed below.

1. Aggregate commitment for defined measures - Enforceable commitments to take specific regulatory and programmatic actions according to a specific schedule to achieve an aggregate amount of emissions reductions by specific years, often referred to as the “aggregate commitment.”
2. Section 182(e)(5) commitment for Future Deployment Measures - A commitment to achieve emissions reductions that were approved under the section 182(e)(5) provisions. These measures are the subject of this report.

e. 182(e)(5) Commitments in the 2016 AQMP

Based on the 2016 AQMP modeling analysis, an additional 45 percent NO_x emission reductions is needed in 2023 to attain the 1997 8-hour ozone NAAQS. This percentage is based on meeting the “carrying capacity” of 141 tpd of NO_x in 2023. To demonstrate attainment, the 2016 AQMP identified the total NO_x reductions to come from: 1) defined measures by South Coast AQMD and CARB totaling 27 tpd (aggregate commitments); and 2) CARB’s “Further Deployment of Cleaner Technologies” under CAA Section 182(e)(5) totaling 108 tpd. This report addresses how the 108 tpd of NO_x reductions can be achieved.

Define the Challenge – emission reductions are getting harder to achieve

Existing CARB and South Coast AQMD control programs have substantially reduced precursor emissions of ozone and will continue to do so into the future through turnover of older vehicles, engines and equipment to cleaner vehicles, engines and equipment. Through regulations adopted and implemented to date, CARB and the air districts have controlled many of the sources that had previously contributed the largest amounts of emissions. Additionally, the 2016 State SIP Strategy included commitments for cleaner heavy-duty truck standards set at the State and federal level. Therefore, regulating the remaining sources subject to State and local authority achieves incrementally smaller amounts of emissions reductions. State and local agencies continue to look to the categories and sources with the largest shares of remaining emissions for further reductions, but it has become increasingly difficult to get the levels of reductions needed from sources within the state and local agencies’ authority to achieve further air quality progress.

Furthermore, the deadlines for attainment of the 80 ppb ozone and other federal standards are fast approaching, and development and full implementation of regulatory measures is not always

possible within the timeframes needed. As these deadlines approach and the amount of emissions reductions possible from new regulations decreases, reductions from voluntary incentive programs become more important in the overall strategy to achieve our attainment goals. In addition, while regulatory programs drive the introduction of cleaner technologies, fuels, and fueling infrastructure, the natural fleet turnover rate and the current pace of market development for the cleanest technologies will not be sufficient to meet California's needs. Clearly signaled, adequately funded, multiple-year incentives will be critical to drive the rapid transformation of the transportation sector to zero-emission technologies wherever feasible and near zero-emission technologies with the cleanest, lowest carbon fuels everywhere else.

In California, there are a variety of voluntary, publicly funded programs in place to encourage the development of, and incentivize the purchase of, cleaner vehicles and engines and these programs have been tremendously successful in reducing emissions. However, additional funding mechanisms, international partnering with shipping lines, research and demonstration projects, and other innovative strategies will be needed to accelerate deployment of these technologies and their related infrastructure to meet our short- and long-term goals. CARB's 2016 State SIP Strategy and related planning documents include a combination of proposed regulations and incentives designed to help shift California from a reliance on petroleum fueled vehicles and off-road equipment to zero- and near zero-emission vehicles and fuels.

Expectation for Development and Deployment of New Technologies

While advanced technologies require time to develop and commercialize, public investment through incentive programs can greatly accelerate this timeline. In addition to directly funding research, development, and deployment, significant public funding can also induce increased levels of private investment as manufacturers become more willing to increase production capacity and provide additional support, training, and infrastructure for clean technologies.

Just as there are a range of regulations, there are a range of incentives at the local, State, and federal levels that support technology advancement at the demonstration, pilot, and commercial deployment stages, or across all technology readiness levels (TRL). The figure below shows the evolution of mobile source technology in California. Public agencies provide key incentives at each level.

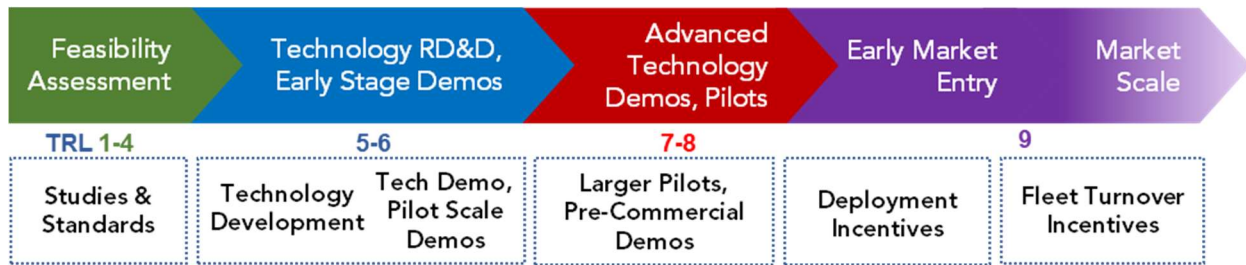


Figure 1-6

Evolution of Mobile Source Technology in California

As the above figure shows, California, through many state and local agencies, invests public funds throughout the stages of technology evolution. This approach is critical because it signals the importance that the local air districts and CARB place on the development and deployment of these advanced technologies, attracting innovators and green businesses to the state. CARB has programs in its incentive portfolio that span from pre-commercial demonstration, pilot, early commercial, and commercial phases of technology and market development.

The continued application of incentive funding throughout all stages accelerates the movement of the market toward market viability and financial stability. Especially for the heavy-duty sectors, increased incentive funding is needed well into the future to ensure that market successes are solidified and that we continue to make progress towards reaching California and South Coast AQMD’s air quality goals. However, the ultimate goal for each technology application is to reach a point of financial sustainability where incentives can be phased out for that specific technology.

Without Federal Efforts, the Basin Cannot Attain the Standard

Despite the many actions being taken by the South Coast AQMD and CARB, the contribution of emissions from interstate and international sources under federal authority, coupled with limitations on local and state regulatory authority, mean that achieving the magnitude of emission reductions necessary to meet federal standards will also require strong action at the federal level. CARB and the South Coast AQMD continue to work with federal and international agencies to advocate for more stringent emission standards for sources that are not under California and local regulatory purview, but federal action has not been sufficient to meet federally mandated air quality objectives.

Achieving the emission reductions necessary from these source categories will require prompt action at the federal and international level, coupled with State and local advocacy and action to facilitate these efforts. Without considerable emission reductions from sources under federal

control, the South Coast Air Basin will not be able to reach attainment in 2023 or the subsequent attainment dates for other air quality standards.

Four Years until the Attainment Date

Given that significant levels of NO_x reductions are still needed for attainment of the 1997 8-hour ozone standard in only four years, an aggressive control strategy needs to be developed and additional actions to obtain emission reductions are required. Although the magnitude of the required reductions represents a daunting challenge, every feasible action must be considered and implemented to achieve as much reductions as possible to provide healthy air for the region.

2. CONTINGENCY MEASURE PLAN

The proposed Contingency Measure Plan (CMP) outlined in this report lays out an aggressive approach for achieving the 108 tpd of NO_x reductions allocated to “Further Deployment of Cleaner Technologies” under section 182(e)(5) necessary to attain the 1997 8-hour ozone standard by 2023. The CMP is comprised of three specific strategies, as described below:

1. **Identified Emission Reduction Strategies** – Since the adoption of the 2016 AQMP, CARB and South Coast AQMD have identified additional emission reductions that can be credited toward the section 182(e)(5) reduction commitments in 2023. These reductions are based on: a) adopted regulations, b) new regulations or programs to be adopted by 2020, c) clean mobile source technologies being implemented which were not reflected in the 2023 emissions inventory, and d) a series of innovative new measures designed to achieve further reductions. Chapter 3 provides a brief description for each of these measures.
2. **Additional Incentive Funding** – Additional emission reductions are expected from both the existing and new sources of incentive funding by accelerating the turn-over of existing mobile sources to cleaner technologies. Chapter 4 discusses the potential future funding sources.
3. **Federal sources and federal measures** – Without further reductions from federal sources (i.e., OGV, aircraft, locomotives, out-of-state trucks), which account for 36% of NO_x emissions, attainment of the 1997 8-hour standard is not possible by 2023. Therefore, to achieve the balance of the section 182(e)(5) commitment, additional reductions are needed from federal sources through federal regulatory programs and/or federal incentive funding. Chapter 5 provides a list of possible federal measures and actions for reducing emissions from sources under federal jurisdiction.

Table 2.1 presents the anticipated emissions reductions for the CMP for addressing the section 182(e)(5) commitment in 2023.

Table 2-1
Contingency Measure Plan Strategies

CMP Strategy	2023 Reductions (tpd)
Identified Emissions Reduction Strategies	24-26
Additional Incentive Funding	15
Federal Measures and/or Funding	67-69
Total	108

3 IDENTIFIED MEASURES THAT CAN ACHIEVE REDUCTIONS BY 2023

As previously described, section 182(e)(5) of the Clean Air Act allows for Extreme nonattainment areas' attainment demonstrations to be based in part on the anticipated development of new technologies or improvement of existing control technologies. These long-term control measures are often referred to as “black box” measures and go beyond the short-term control measures that are based on known and demonstrated technologies. The 2016 State SIP Strategy includes both defined regulatory/incentive measures as well as measures identified as “Further Deployment of Cleaner Technologies” measures that do not yet have fully-defined implementation strategies (i.e., proposed under section 182(e)(5)). This section describes the newly identified measures, beyond the emission reductions quantified in the 2016 AQMP and the State SIP Strategy, to be used as contingency measures for the reductions specified under section 182(e)(5)'s “Further Deployment of Cleaner Technologies” in the State SIP Strategy.

a. South Coast AQMD Measures Providing NO_x Reductions Not Included in the 2016 AQMP

The 2016 AQMP was adopted in March 2017 and approved by CARB the same month. Among the 27 control measures targeting NO_x, ten have quantifiable NO_x emission reductions while the reductions from the remaining control measures were left to be determined (TBD) in the AQMP. The “TBD” measures require further technical and feasibility evaluations to determine their emission reduction potential and thus, the attainment demonstration is not dependent on these measures. Emissions reductions achieved and quantified by these measures can be applied towards section 182(e)(5)'s contingency requirements.

Table 3-1 provides a list of the South Coast AQMD's identified emissions reduction strategies with reduction benefits that were not specifically quantified in the 2016 AQMP. Since the adoption of the 2016 AQMP, South Coast AQMD has taken several actions to develop rules and programs to further reduce NO_x emissions. On May 4, 2018, the South Coast AQMD Governing Board directed staff to pursue various approaches with some of the Basin's largest indirect sources: a voluntary Memorandum of Understanding (MOU) approach with marine ports and commercial airports and regulatory approaches for warehouses/distribution centers, railyards and new and re-development. The MOUs with the marine ports and commercial airports will implement the facility-based mobile source measures (FBMSMs) MOB-01 and MOB-04 in the 2016 AQMP, with now quantifiable emissions reductions. In addition, pursuant to directives listed in control measure CMB-05 of the 2016 AQMP and in recently adopted state statute (AB 617), RECLAIM facilities are subject to an expedited implementation schedule to install additional BARCT no later than December 31, 2023, which accelerated the implementation schedule of CMB-05, thereby providing additional emission reduction benefits in 2023. Additional NO_x emission reductions anticipated from continued implementation of existing incentive programs with future funding will also generate reductions that are surplus to

the South Coast AQMD’s aggregate commitments as described in the 2016 AQMP. Also, reductions are anticipated from deployment of Metrolink’s Tier 4 locomotives, which were not included in the 2016 AQMP inventory. Finally, because of the updated OGV inventory and CARB’s SIP strategy for OGVs, there are surplus reductions from OGV’s that can be allocated toward the section 182(e)(5) reduction commitments. Details of each identified measure are provided in subsequent sections.

Table 3-1
South Coast AQMD’s Identified Measures Providing Additional NOx Reductions
toward CAA 182 (e)(5) Commitments

Measure/Program	Date of Adoption/ Implementation	Emissions Reductions (tpd in 2023)
RECLAIM Transition Rules	2020	2
Facility-Based Mobile Source Measure for Commercial Airports	December 2018	0.5
Facility-Based Mobile Source Measure for Marine Ports	Early 2020	3.2 – 5.2
Incentive Funding (Expected Future Funding)	2020-2023	1.5
Metrolink Tier 4 Locomotives Conversion	Full Implementation Before 2023	3.0
Total Reductions Towards 182(e)(5) Commitment *		14 - 16

** Preliminary estimates; also includes 4.2 tons per day of reductions associated with updated OGV emissions inventory and CARB’s SIP Strategy for OGV.*

RECLAIM BARCT Rules

As described in more detail under Section 1c, for SIP accounting purposes, reductions from adopted rules are first allocated to account for the reduction commitments specified under RECLAIM Rule 2002 that were part of the 2016 AQMP baseline emissions inventory. Only surplus emission reductions beyond the baseline can be credited towards the CAA section 182(e)(5) commitment. Table 3-2 lists the anticipated rules to be adopted in 2020 that go beyond the reductions specified under RECLAIM Rule 2002. These anticipated rules include Rule 1109.1 for refinery equipment, Rule 1150.3 for landfills, Rule 1179.1 for combustion equipment and publicly owned treatment work facilities, and Rule 1146.2 for large water heaters and small boilers and process heaters. It should be noted that for the anticipated rules, the final emission reduction amounts are still being determined and will be finalized during the rulemaking process. The approximately 2 tpd of additional emission reductions from these anticipated rules will be surplus for 2023 (the 2016 AQMP CMB-05 commitment of 5 tpd is for 2025 with no credit taken for 2023) and can be credited to the section 182(e)(5) commitments.

Table 3-2
Allocation of Surplus Emission Reductions for RECLAIM Transition

	Rule	NOx Reduction in 2023 (tpd)
Rules to be Adopted in 2020	Rule 1109.1 – Refinery Equipment	2
	Rule 1150.3 – Emissions of Oxides of Nitrogen from Combustion Equipment at Landfills	
	Rule 1179.1 – NOx Emission Reduction from Combustion Equipment and Publicly Owned Treatment Work Facilities	
Rules beyond 2020	Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters	

Facility-Based Mobile Source Measure (FBMSM) for Commercial Airports

The 2016 AQMP includes South Coast AQMD’s proposed Facility-Based Mobile Source Measures (FBMSMs) to help reduce emissions from indirect sources. Indirect sources are facilities that have limited direct emissions, but attract significant mobile emissions, such as airports, ports, and warehouses. Control Measure MOB-04: Emission Reductions at Commercial Airports covers emissions from non-aircraft airport-related mobile sources, including ground support equipment, shuttle buses, trucks, and on-road and off-road vehicles. In May 2018, the South Coast AQMD Governing Board directed staff to pursue a voluntary Memorandum of Understanding (MOU) approach for the non-aircraft sources at five commercial airports in the Basin - Los Angeles International Airport, John Wayne Airport, Burbank Airport, Long Beach Airport, and Ontario Airport. Following the Board’s direction, South Coast AQMD established an Airport MOU working group for the development and implementation of the MOUs with the airports. The draft MOUs are developed based on the Air Quality Improvement Plans/Measures (AQIP/AQIM) that the airports have prepared, which include specific airport measures and initiatives for reducing emissions from non-aircraft sources. Under the MOUs, the airports will commit to implement specified AQIP/AQIM measures that are potentially eligible for SIP credit and provide annual reports to South Coast AQMD on the implementation of these measures. South Coast AQMD will be responsible for quantifying the emissions benefits for these potential SIP creditable measures and making up any emission reduction shortfall.

The FBMSM for commercial airports is expected to achieve 0.5 tpd of NOx emission reductions in 2023 based on the implementation of SIP creditable AQIP/AQIM measures, which primarily focus on ground support equipment but also include additional measures for shuttle buses and

vehicles/trucks. For ground support equipment, the airports are establishing airport-specific emissions performance targets (i.e., grams of NO_x/HC per horsepower hour) in 2023 and 2031, which would require transitioning to cleaner or zero-emission equipment. For shuttle buses and vehicles, zero-emission or near-zero-emission vehicles are being proposed.

Facility-Based Mobile Source Measure for Marine Ports

The 2016 AQMP also includes Control Measure MOB-01: Emission Reductions at Commercial Marine Ports. This measure covers emissions from port-related mobile sources, including drayage trucks and cargo handling equipment. In May 2018, the South Coast AQMD Governing Board directed staff to pursue a voluntary Memorandum of Understanding (MOU) approach for the Ports of Los Angeles and Long Beach. The MOU will include specific measures from the Ports' 2017 Clean Air Action Plan (CAAP) update, with the goal of obtaining SIP creditable emission reductions from those measures. Following the Board's direction, South Coast AQMD established a Technical Working Group (TWG) to develop methodologies and quantify emissions benefits associated with the implementation of CAAP measures. The TWG is comprised of representatives from South Coast AQMD, CARB, U.S. EPA, Ports of Los Angeles and Long Beach, Coalition for Clean Air, Sierra Club, Pacific Merchant Shipping Association, and California Trucking Association. In addition, a Ports MOU working group has been established to track the development and implementation of the MOU. Under the MOU, the Ports will commit to implement specified CAAP measures with South Coast AQMD committing to quantify the emission benefits and make up any emissions reduction shortfall.

In addition, the Ports of Los Angeles and Long Beach have been implementing a voluntary incentive-based Vessel Speed Reduction (VSR) Program and Green Flag Incentive Program, respectively, over the last several years. Under these programs, the Ports offer monetary incentives to shipping lines that reduce their transiting speeds to 12 knots within 20 nautical miles and 40 nautical miles of Point Fermin. The benefits of the Ports' VSR programs, included in the 2016 AQMP inventory, were based on the Ports implementation of the VSR programs in 2014. However, with continued improvements in the VSR Program, the Ports have reported higher compliance rates in 2017. Based on the 2017 VSR compliance rates reported by the Ports, the surplus NO_x reductions are estimated to be 0.2 tpd in 2023.

The Ports MOU is estimated to achieve 3.2 to 5.2 tpd of NO_x emission reductions in 2023 based on the implementation of proposed SIP creditable CAAP measures, primarily focusing on drayage trucks and potentially on cargo handling equipment. Under the proposed updates to Clean Truck Program, a rate will be charged to the beneficial cargo owners for heavy-duty trucks with loaded containers entering or exiting the Ports' terminals, with possible exemptions provided for zero and near-zero emission trucks. The revenues to be collected through the assessment of the rate will be used as incentives for fleets to replace their existing trucks with

zero and near-zero emission trucks. As for cargo handling equipment, the emission reductions are largely associated with electrifying terminal equipment, including on-going modernization projects at several terminals. The estimated reductions from cargo handling equipment are yet to be quantified.

Additional Emission Reductions from Incentive Funding (existing funding sources)

The 2016 AQMP highlighted the need for a significant level of incentive funding to achieve additional reductions in a timely manner. The 2016 AQMP provides an analysis of the incentive funding levels that will be needed to achieve the emission reductions associated with the State SIP Strategy “Further Deployment of Cleaner Technologies” measures if no other actions occur. The total amount of funding needed to achieve the 2023 NO_x emission reductions identified in the State Mobile Source Strategy ranges from \$4.3 billion to as high as \$14 billion depending on the types of funding programs implemented and which mobile source sectors will be more cost effective to reduce emissions. California and the South Coast AQMD have a long history of successful implementation of incentive programs that help fund the accelerated deployment of cleaner engines and after-treatment technologies in on-road heavy-duty vehicles and off-road mobile equipment. Such accelerated deployment not only results in early emission reductions, but also provides a signal to technology providers, engine and automobile manufacturers, and academic researchers to develop and commercialize the cleanest combustion engines possible and further the efforts to commercialize zero-emission technologies into a wider market. Some of the major incentive sources include:

- Carl Moyer Memorial Air Quality Standards Attainment Program (SB1107 and AB 923)
- AB 118 – California Alternative and Renewable Fuel, Vehicle Technology, Clean Air, and Carbon Reduction Act of 2007
- Proposition 1B – Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006
- Low Carbon Transportation Funding (Greenhouse Gas Reduction Fund)
- AB 2766 – Motor Vehicle Fee Program
- South Coast AQMD Clean Fuels Program
- South Coast AQMD Rule 2202 – On-Road Motor Vehicle Mitigation Options
- AB 617 and AB 134

Since the adoption of the 2016 AQMP, the South Coast AQMD has implemented a range of incentive funds available to local fleets to accelerate implementation of lower emitting technologies, and provided outreach to support cleaner technologies. Table 3-3 lists the number of affected mobile source equipment and emission reductions in tons per year (tpy) for projects approved in 2018. This serves to demonstrate South Coast AQMD’s ability to implement

incentive programs in the region, and that incentive programs are an effective means to generate emission reductions.

Table 3-3
Summary of South Coast AQMD's Board Approved
Incentive Programs in 2018

Program	Funding Amount	No. of Equipment	NOx (tpy)	PM2.5 (tpy)
Carl Moyer & SOON	\$35,559,645	558	415	7.8
AB 134	\$49,060,072			
Near-Zero Trucks with CEC Grant, Ports, and AB	\$14,000,000	140	63.2	–
Near-Zero Emission School Buses	\$35,638,000	206	27.1	1.5
EFMP	\$8,257,730	1,023	14.4	--
Voucher Incentive (VIP)	\$2,745,000	65	44.2	0.12
TOTAL	\$ 145,260,447	1,992	563.9	9.42

In the last few years, the South Coast AQMD and its State and regional partners implemented around \$100 to \$200 million per year in incentives funding. Since the 2016 AQMP, actions have been undertaken to secure a significant sustainable level of funding revenue. Table 3-4 provides a summary of reasonably expected future funding for the major incentive programs in the Basin that are estimated to be about \$800 million of funding over the next 3-4 years.

Based on the expected future funding of approximately \$800 million over the next 4 years, about 12 tpd of NOx reductions are expected to be achieved by 2023. After fulfilling South Coast AQMD's aggregate commitments for 2016 AQMP control measures MOB-10, MOB-11 and MOB-14, the remaining surplus reductions are estimated at approximately 1.5 tpd of NOx emissions in 2023 that can be used for the South Coast AQMD's section 182(e)(5) commitments.

Table 3-4
Summary of Reasonably Expected Future Funding

Funding Source	Expected Funding
Carl Moyer	\$40-\$50 million per year
AB 617-related Incentives	\$80-\$90 million per year
AB 2766	\$22 million per year
Mobile Source Air Pollution Reduction Review Committee	\$17 million per year
Volkswagen Settlement	\$67 million (total)
Prop 1B	\$30 million (total)

Based on the expected future funding of approximately \$800 million over the next 4 years, about 12 tpd of NO_x reductions are expected to be achieved by 2023. After fulfilling South Coast AQMD's aggregate commitments for 2016 AQMP control measures MOB-10, MOB-11 and MOB-14, the remaining surplus reductions are estimated at approximately 1.5 tpd of NO_x emissions in 2023 that can be used for the South Coast AQMD's section 182(e)(5) commitments.

Metrolink Tier 4 Locomotives Conversions

The South Coast AQMD Governing Board has awarded Metrolink a total of \$101.85 million since February 2013 for the replacement of 37 older locomotives (Tier 0 & Tier 2) with Tier 4 locomotives and the new purchase of three Tier 4 locomotives. As of September 2019, 27 Tier 4 locomotives have been delivered to Metrolink with 23 units deployed in revenue service or undergoing shakedown testing. Metrolink anticipates all 40 Tier 4 locomotives will be deployed in service by the end of 2020. Upon full deployment, Metrolink will operate 40 train sets with Tier 4 locomotives. Metrolink will retain several Tier 2 locomotives as spare or standby units to fill in during scheduled and unscheduled maintenances for the Tier 4 locomotives. Based on the preventive maintenance schedule, Metrolink anticipates at least three Tier 4 units will be out of service at a time, with the normal operation cycle including 37 Tier 4s and 3 Tier 2s in service on a daily basis. The emission reductions from the Tier 4 conversions and the purchase of the new Tier 4 locomotives, which are surplus to the 2016 AQMP inventory, are estimated to be 3 tpd in 2023.

Updated OGV Inventory and SIP Strategy

During the development of the 2016 AQMP, the emissions inventory was frequently updated to incorporate the latest available information and methodologies. The Draft 2016 AQMP was first released to the public for review and comment in June 2016, and a Revised Draft 2016 AQMP was subsequently released in October 2016. Both of these documents incorporated the best available emission inventory at the time of their development. In the last quarter of 2016, the emissions for OGV were updated with significant increases of NO_x emissions in future years, primarily due to the delayed introduction of Tier 3 engines in California waters. However, there was not enough time to incorporate the emissions inventory update in the attainment demonstration for the various federal standards addressed in the 2016 AQMP. To ensure that attainment could still be achieved, the State SIP Strategy was revised with increased emission reductions commitments in the OGV category to accommodate the changes in OGV emission inventory that were not reflected in the 2016 AQMP SIP submittal.

In 2018, CARB adopted the 2018 Updates to the California State Implementation Plan (2018 SIP Update) in response to recent court decisions related to ozone reasonable further progress baseline inventory years and contingency measures. The 2018 SIP Update includes an updated emission inventory incorporating the changes in the OGV category. As a result, the 2023 baseline emissions for OGV has been increased from 23 tpd to 37 tpd in the South Coast Air Basin (within 100 nautical miles). After incorporating the OGV inventory updates into the attainment demonstration, it was discovered that the emission reductions commitment for the OGV category in the 2016 AQMP and State SIP Strategy was higher than needed, with an additional 4.2 tpd of NO_x emission reductions beyond the projected carrying capacity of 141 tpd. Therefore, to reflect the most up-to-date emissions inventory and control strategy, a 4.2 tpd of NO_x reductions is realized from the over-commitment in the 2016 AQMP and State SIP Strategy.

Residential and Commercial Sectors

Despite existing stringent regulations for many sources, the attainment of the 1997 8-hour ozone standard will require extensive deployment of zero and near-zero NO_x emission technologies in all sectors. For the residential and commercial sectors, there are opportunities to require and accelerate the replacement of existing equipment with cleaner zero- or near-zero emissions alternatives. Reducing, managing, and changing the way energy is used in the commercial and residential sectors can also provide additional emission reductions, reduce energy costs, and provide multiple environmental benefits. The 2016 AQMP includes control measures for the applications of zero or near-zero NO_x emissions appliances in the residential and commercial sector (CMB-02), additional enhancement in reducing energy use in existing residential buildings (ECC-03), and co-benefits from existing residential and commercial building energy

efficiency mandates (ECC-02). These three control measures together anticipate 2.6 tpd of NOx reductions by 2023. South Coast AQMD will continue to evaluate opportunities for additional feasible NOx reductions in existing and new residential and commercial buildings, including potential rulemaking in the 2020-2022 timeframe. Any potential surplus reductions achieved beyond the South Coast AQMD’s aggregate reduction commitments in 2023 can be applied toward the reductions claimed under section 182(e)(5) measures and attainment in 2023.

b. CARB Regulations Providing NOx Reductions Not Included in the 2016 AQMP

In addition to those measures that were defined in the State SIP Strategy, CARB is implementing new measures that will achieve reductions toward California’s section 182(e)(5) commitment. These measures are listed in the Table 3-5 with descriptions following.

Table 3-5
CARB New Mobile Source Measures toward Section 182(e)(5) Commitment

Measure	Date of Adoption (Expected)	Achieved NOx Emissions Reductions in 2023 (tpd)
Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation	September 2018	1.7
ATCM for Portable Engines, and the Statewide Portable Equipment Registration Program Regulation	November 2017	0.25
HD Inspection and Maintenance (I/M) program	(Early 2020)	4.2
Total Mobile Source Reductions Towards Section 182(e)(5) Commitment		6.15

Low Carbon Fuels Standard Amendment

On September 27, 2018, the CARB Board approved amendments to the Low Carbon Fuel Standard (LCFS), which strengthens and smooths the Carbon Intensity (CI) benchmarks through 2030 in-line with California’s 2030 GHG target enacted through SB32. The LCFS transforms and diversifies the fuel pool in California to reduce petroleum dependency and achieve air quality benefits. The LCFS is a key part of a comprehensive set of programs in California to reduce emissions from the transportation sector.

The LCFS sets annual CI standards, or benchmarks, which reduce over time, for gasoline, diesel, and the fuels that replace them. The new fuels will not only lower GHGs but also improve California’s air quality relative to current (2016) conditions and to the business-as-usual

scenario. The total statewide NO_x and PM_{2.5} emissions are estimated to be lower in each year from 2019 through 2030.

ATCM for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater, and the Statewide Portable Equipment Registration Program Regulation

On November 16, 2017, CARB approved amendments to the Portable Equipment ATCM and PERP Regulation (PERP Regulation). The PERP Regulation requires operators to upgrade their equipment by 2020 to meet emissions requirements. The PERP Regulation was designed to force the development of retrofit emissions control technologies and new engine technologies to meet regulatory requirements. Some of these technologies materialized and some did not. Because some technologies did not develop as anticipated, the current PERP Regulation requirements are financially and, in some cases, technologically infeasible. The new PERP Regulation restructures the emissions requirements so that implementation and enforcement of the regulation is feasible, the regulated fleets can comply, and emissions reductions are achieved.

Heavy Duty Truck Inspection and Maintenance Program

Scheduled for consideration by CARB in early 2020, the Heavy-Duty Truck Inspection and Maintenance Program (HD I/M program) will be designed to incentivize vehicle owner and driver behavior to ensure that heavy-duty vehicles are well maintained and properly repaired.

In California, heavy-duty diesel vehicles with a gross vehicle weight rating over 14,000 pounds represent one of the largest sources of mobile air pollution. 2019 estimates indicate that these vehicles contribute approximately 58 percent of the statewide on-road mobile source NO_x emissions. Some of these emissions are attributed to broken or failing emissions-related equipment.

CARB's existing heavy-duty inspection programs rely on random field inspections by CARB staff and annual self-inspections by truck owners to test for smoke opacity levels. However, these programs do not ensure that vehicle owners are regularly inspecting and repairing their vehicles' broken emissions controls. The HD I/M program will ensure that vehicles' emissions control systems are operating as designed to reduce emissions, and also remove gross polluting HD vehicles from the roads.

c. CARB Innovative New Measures

California has identified additional, innovative measures beyond those regulations identified above that were not identified in the 2016 AQMP and State SIP Strategy, but have been adopted, or are soon to be adopted by CARB. These actions are more innovative in nature and represent a next-level effort to continue to reduce emissions in the Basin. In some cases, these measures go

beyond the historical model of programs and regulations and represent the level of transformation needed of every sector to achieve clean air. These measures are described below.

Tier 5 Off-Road Diesel Engine Standard

CARB has adopted four increasingly stringent tiers of regulations to reduce emissions from off-road diesel engines since 1995 to minimize the adverse health effects of diesel emissions. However, it has been almost 14 years since the off-road diesel standards were last updated (Tier 4 in 2005), which now lag behind the European Stage V nonroad diesel standards in stringency. As a result, the emissions contribution from off-road diesel engines continues to increase and will exceed the contribution from on-road diesel engines by 2025, making off-road diesel the single largest source of mobile NO_x emissions in California. This measure would include adopting more-stringent standards that reduce NO_x and PM emissions by up to 90% below the current Tier 4 standards, as well as potential requirements to offer off-road vehicles with zero-emission technology for sale.

State Green Contracting

California's State Transportation Agency spends approximately \$5 billion annually on building and maintaining California roads. In addition, the State government purchases new vehicles and equipment each year. This measure would consider requiring State contractors to use the cleanest equipment available in order to be considered for these contracts and State agencies to purchase the cleanest vehicles and equipment that are available. This measure builds on Governor Newsom's recent directive for State government to immediately redouble efforts to reduce greenhouse gas emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy.

Reduction in Growth of Single-Occupancy Vehicle Travel

This measure would consider applying a regional transportation system pricing program in conjunction with requirements to use the generated funding to encourage people to take public transit, carpool, bike, walk, and/or adjust trip times at congested times of day. The regional pricing program would implement a suite of regional and locally focused pricing strategies for use of certain lanes, driving into certain areas, parking in prime locations, driving at peak times, and/or utilizing non-pooled ridehailing services. Funds generated from the program must be used to either encourage use of existing identified clean transportation options or to provide additional clean transportation options. Some examples include, but are not limited to: reducing the cost of transit via transit passes, providing rebates for e-bikes, providing lower cost or reserved parking spaces for carpools, educating the public about the availability of per-mile car insurance pricing options, and providing traveler incentives to encourage travel at times when roads are less congested.

Locomotive Emission Reduction Measure

CARB is evaluating concepts for a potential regulation to reduce criteria, toxics, and greenhouse gas emissions from locomotives. These concepts address in-use locomotive emissions, idling, and maintenance activities. The potential regulation includes elements that could be implemented at the state and/or district level.

Previously, state action to limit rail emissions has been through enforceable agreements. Although a regulation will take more time to implement than an agreement, it will not sunset like previous MOUs, it will be more transparent in its development, it will be enforceable, and it will achieve additional emissions reductions.

Specifically, one of CARB's concepts, called the Locomotive Emissions Reduction Spending Account, requires that the Class 1 railroads set aside funds each year to purchase Tier 4 or cleaner locomotives. The amount to be set aside is based on the usage of Tier 3 and lower (dirtier) locomotives in California. The charge increases with the emissions level of the locomotive used, which should encourage cleaner locomotive operation within the state. The Account could begin implementation by the end of 2022, with potential PM and NO_x reductions achieved by the end of 2023. Note, CARB staff will coordinate with the South Coast AQMD to ensure this measure does not duplicate the FBMSM for railyards.

VMT and Land Conservation

Integrating land and transportation strategies can have synergistic effects and help the state further reduce both criteria and greenhouse gas emissions by protecting land-based carbon while providing simultaneous reductions in emissions from transportation. Protection of lands that are at risk of conversion to urban or rural development through use of conservation easements or the implementation of local and regional planning policies that protect land from development result in the extinguishment of development rights, thereby avoiding increases in VMT by limiting opportunities for expansive, vehicle-dependent forms of development. Currently, only some sustainable community strategies in regional transportation plans explicitly include conservation and management of natural and working lands. While cities and counties across California have developed local and county climate action plans to reduce GHG emissions and increase climate resilience, few capture the potential GHG reductions from conserving, restoring, and managing Natural Working Lands. Although limited research is available on the direct effect of land conservation on VMT, the State is expanding efforts to understand the relationship and synergies of taking an integrated cross-sector approach.

Regional VMT Reductions

Today's California is shaped by historic patterns of growth in transportation and housing. While we have grown to be the fifth largest economy in the world, our residents, in search of an

affordable place to live, and with insufficient transportation options, are too often left with little choice but to spend significant time and money driving from place to place. Where we put transportation and housing also imposes and often reinforces long-standing racial and economic injustices by placing a disproportionate burden on low-income residents, who end up paying the highest proportion of their wages for housing and commuting. Staff and elected officials of local, sub-regional, regional, and state government bodies all have critical authorities and roles to contribute and could take steps to improve these outcomes, but so far, have not been able to enact the magnitude of change needed given the state's current structure of incentives, political forces, and policy restrictions. There are unique opportunities for elected officials to improve the transportation sector to reduce emissions and help with attainment of health-based air quality standards in the South Coast.

Co-Benefits from Electrification of Buildings due to 2017 Climate Change Scoping Plan

Buildings contribute directly to emissions when fuel (primarily natural gas) is combusted on-site for space and water heating. As grid electricity in California transitions to 100 percent clean energy, building electrification can reduce fuel combustion emissions in buildings. The framework for this measure is contained in Alternative 1 of the 2017 Climate Change Scoping Plan, and includes measures pertaining to appliance technology substitution; demand reduction; electrical efficiency in industry, agriculture, residential, and commercial lighting; and residential air conditioning, freezing, and refrigeration. An implementation framework for building electrification would consider mechanisms to require and incentivize early retirement/replacement and new installations of residential and commercial water heating, space heating, and air conditioning appliances with zero or near-zero emission technologies such as high efficiency electric heat pumps. Quantification of surplus emission reductions in this sector must consider the 2016 AQMP commitments as well as any additional South Coast AQMD regulatory actions.

4. ADDITIONAL INCENTIVE FUNDING THROUGH SOUTH COAST AQMD'S STATE LEGISLATIVE EFFORTS

South Coast AQMD has been making sustained efforts locally and with the state legislature to seek funding to implement the 2016 AQMP for the South Coast region and will continue to do so going forward. The 2016 AQMP calls for over \$1 billion per year in incentive funding for clean vehicles, infrastructure, and equipment.

In 2017, the South Coast AQMD sponsored AB 1274 (O'Donnell), which was signed into law. Beginning in 2019, this bill creates annual smog abatement fees that are transferred to the Carl Moyer Program for more effective reductions in diesel particulate matter and nitrogen oxide emissions. This bill is anticipated to create a sustainable funding source of about \$25-30 million annually for the South Coast region. Also, through budget trailer bill AB 134, South Coast AQMD received a one-time allocation of \$107.5 million in Greenhouse Gas Reduction Fund (GGRF) monies for increased Carl Moyer Program funding for incentives to accelerate turnover to cleaner vehicles and equipment and reduce criteria air pollutant and toxic air contaminant emissions in the South Coast region.

In 2018, as a result of budget trailer bill SB 856, South Coast AQMD ultimately received a one-time allocation of about \$86 million in GGRF funding for AB 617 incentives to accelerate turnover to cleaner vehicles and equipment and reduce criteria air pollutant and toxic air contaminant emissions that will benefit disadvantaged communities within the South Coast region that are in the AB 617 program or are being considered for that program in future years.

In 2019, as a result of budget bill AB 74 (Ting), South Coast AQMD is expected to again receive a one-time allocation of about \$86 million in GGRF funding that shall be available for financial incentives to reduce mobile and stationary sources of criteria air pollutants or toxic air contaminants within the South Coast region, consistent with community emissions reduction programs developed pursuant to the AB 617 program and its statutory requirements (Section 44391.2 of the Health and Safety Code).

Moving forward, through 2023, several funding sources will be advocated for including: (1) GGRF funds, (2) Statewide Bond Funding, and (3) The Voting District Authorization for Clean Air legislation, SB 732 (Allen).

1. GGRF - Given that the South Coast region already has three approved communities in the AB 617 program and is likely to add 2 more in 2020, South Coast AQMD will be advocating for at least \$150 to \$200 million in sustainable annual GGRF monies for incentive funding going forward, to benefit disadvantaged communities within the South Coast region that are in the AB 617 program or are being considered for that program in future years.

2. Statewide Bond Funding – Currently, there are multiple pieces of state legislation that would result in bond measures for the statewide ballot (e.g. AB 352 (E. Garcia); AB 1298 (Mullin); and SB 45 (Allen)), that include funding at around the \$4 billion level, for purposes that include the funding of zero-and near-zero-emission vehicle technologies and infrastructure. These bills are expected to be consolidated into one primary bond bill in 2020 and represent a potential substantial source of incentive funding to benefit air quality within the South Coast region. South Coast AQMD staff will be working with the California Air Pollution Control Officers Association (CAPCOA) to secure a portion of these bond monies for incentive funding for local air districts, including in the South Coast region, to reduce air pollution and facilitate attainment of federal air quality standards.
3. Voting District Authorization for Clean Air Legislation, SB 732 (Allen):
 - South Coast AQMD is currently sponsoring state legislation, SB 732 (Allen), which seeks authorization from the Legislature to create a voting district in the South Coast region to allow local funding measures to be placed on the ballot. The bill allows the people of the South Coast region to decide for themselves whether they want to invest in clean air and address climate change. Once the bill passes the state legislature and is signed into law, it would allow a sales tax measure to be put on a ballot within the South Coast region, either by voter initiative or by South Coast AQMD Board action.
 - This bill could result in the South Coast region receiving a sustainable source of funding in the amount of about \$1.4 billion per year, to be used primarily for incentive funding for clean vehicles, infrastructure, and equipment to facilitate implementation of the 2016 AQMP and future AQMPs within the South Coast region.

Further, South Coast AQMD will continue working hard to explore all additional options, as needed, to help secure sufficient funding to implement the 2016 AQMP and attain federal air quality standards in the South Coast region.

The anticipated future funding of \$1.4 billion from the Voting District Authorization bill per year is expected to generate 15 tpd of NO_x reductions in 2023. Using detailed on-road and off-road vehicle populations (including by horsepower bin and model years), vehicle utilization (e.g., miles/year or horsepower-hours/year), and emissions data from CARB's EMFAC and ORION databases, staff calculated the potential emission reductions from future incentive funding programs. Incentive funding levels per vehicle/equipment type and fuel type (e.g., natural gas, electric, etc.) were estimated by analyzing South Coast AQMD's historical and current implementation of funding programs such as Carl Moyer and HVIP. The calculation ranked each vehicle category by cost-effectiveness (dollars per ton of NO_x reduced in 2023) and

assumed that the entire population of that category would be funded before moving on to the next most cost-effective category, and so on, until total available funding was utilized.

5. FEDERAL MEASURES AND FEDERAL RESPONSIBILITY

a. California Lacks Direct Regulatory Authority Over Significant Sources of Emissions

Emission reductions from mobile sources rely on regulatory actions by CARB, Bureau of Automotive Repair (BAR), and U.S. EPA. California’s authority to regulate mobile sources varies by category and circumstance. Under California law, CARB can set new engine standards for mobile sources, but federal preemptions and practical limitations apply to many diesel engine categories. For example, under the federal Clean Air Act, only U.S. EPA can set new engine standards for interstate trucks, locomotives, airplanes and construction and farm equipment equipped with off-road engines less than 175 horsepower.

In the case of new heavy-duty diesel trucks and other new and in-use off-road engines, CARB may establish emission standards, but must obtain a waiver/authorization from U.S. EPA before it can enforce such regulations. With a waiver to establish its own truck standards, California can achieve reductions from trucks sold within the State. However, the interstate nature of trucking means that many of the trucks operating in the Basin on any given day are not subject to California’s new engine emissions standards. This makes national standards for new trucks operating in California a practical necessity for achieving healthy air for the residents in the Basin. With regard to emissions from shipping, we further recognize that U.S. EPA has the responsibility to represent California’s interests in the international standard setting process for OGVs. In short, California must rely on federal action to set the new technology standards that will accelerate cleanup of legacy diesel fleets.

Table 5-1
Sources under Federal and International Control

New heavy-duty trucks and engines sold outside of California
Locomotives (passenger and freight)
All aircraft engines (U.S. EPA advocates to the International Civil Aviation Organization)
Construction and agricultural equipment under 175 horsepower
Ocean-going vessels (U.S. EPA advocates to the International Maritime Organization)

Given that California is required by federal law to reduce NOx emissions in the Basin to a sufficient level to meet the 80 ppb ozone standard, and that federal sources under federal and international control (OGVs, locomotives, aircraft, interstate trucks and some offroad equipment) are projected to account for over one third of the NOx emissions in the attainment year, it is appropriate and necessary to include measures that get reductions from these sources. In addition, given that the State is pushing the boundaries of technology to develop

measures to reduce emissions from mobile sources under State control, the following federal measures are achievable and necessary to provide the NOx reductions from federal and international sources to meet the healthy air goals set by federal law.

b. NOx Emissions from Sources Under Federal Responsibility are an Increasing Portion of the Inventory

Over the last two decades, despite significant increases in population and vehicles, air quality has improved drastically in the Basin largely due to the implementation of emission control measures by the South Coast AQMD and CARB. As a direct result of California’s programs (including newly identified emission reduction strategies in this contingency measure plan), California is anticipated to slash emissions by 83% for sources under California’s authority between 2002 and 2023. Table 5-2 shows the magnitude of emission reductions that California has achieved since the 2007 AQMP – the first AQMP designed to achieve the 1997 standard. In 2002, the base year of the 2007 AQMP, NOx emissions under California’s authority were at 761 tpd. Through rigorous rules and regulations, as well as incentive programs, the emissions were projected to be 172 tpd in 2023. In the 2016 AQMP, CARB and the South Coast AQMD committed to reduce 27 tpd of NOx emissions by 2023 through a series of defined measures. In this Contingency Measure Plan, CARB and the South Coast AQMD have identified additional defined measures to reduce NOx emissions for at least another 16 tpd by 2023, leaving 129 tpd of NOx emissions under California regulated sources in 2023.

Table 5-2
Reductions in NOx Emissions for Sources under California’s Authority

	Sources under California’s Authority	Attainment Scenario
2002 NOx Emissions (baseline emissions incorporating existing rules and regulations)	761 tpd	761 tpd
2023 NOx Emissions (future baseline emissions incorporating existing rules and regulations)	172 tpd	-
2023 Controlled NOx Emissions (controlled emissions incorporating existing rules and regulations, aggregate commitments, and identified emission reductions)	129 tpd*	-
2023 Carrying Capacity	-	141 tpd
Percentage Reductions from 2002 to 2023	83%	81%

* Includes 27 tpd of defined reduction commitments in the 2016 AQMP and 16 tpd of newly identified emissions reductions in the Contingency Measure Plan

As shown above, using its authority, California has been doing its part to protect air quality. In fact, California's NO_x reductions of 83% has exceeded its fair share for what is needed to meet the carrying capacity (81%, Table 5-2). In contrast, U.S. EPA has not done its part. Due to limited action from U.S. EPA, pollution from sources over which it has been given substantial responsibility — including interstate trucks, aircraft, locomotives, ocean-going vessels, and off-road equipment — had not been reduced to the extent that is needed to reach attainment. Traditionally, NO_x emissions from sources outside of California's control were a relatively small portion of the total NO_x inventory in the State. For example, in 2000, emissions from interstate trucks, aircraft, trains, ocean-going vessels, and some off-road engines together made up approximately 20 percent of California's total NO_x inventory.

As California adopted programs to control NO_x emissions from sources under State and local air district authority, the share of NO_x emissions from sources under federal and international control has increased. For example, those same sources – interstate trucks, aircraft, locomotives, OGVs, and some off-road engines – will be responsible for 36 percent of the NO_x emissions in 2023. While total NO_x emissions will decrease in the South Coast by almost 50 percent from 2012 levels in 2023, almost all of these reductions are from sources under California regulatory authority. For example, over this time NO_x emissions from light-duty vehicles will be reduced by over 70 percent. Meanwhile, NO_x emissions from aircraft, locomotives, and ocean going vessels will grow by almost 10 percent over this same period.

Because out-of-state heavy-duty vehicles operating in the South Coast are a significant part of the fleet, timely federal action to implement a national low-NO_x performance standard is necessary to achieve an in-use fleet average that provides the emission reductions from heavy-duty trucks needed for ozone attainment. A federal standard would be able to ensure that all trucks traveling within California would eventually be equipped with an engine meeting the lower NO_x standard, while emission reductions resulting from California-only regulations would come mostly from Class 4-6 vehicles (as most miles traveled by Class 7 and 8 vehicles operating in California were originally purchased outside the State). The preponderance of interstate trucking's contribution to in-state VMT, especially within the heavier truck categories, means that a federal low-NO_x standard would be substantially more effective at reducing in-state emissions than a California-only standard. Although EPA is currently working on revising the NO_x emission standards for heavy-duty trucks, it appears that emission reductions will not occur before 2027.

Timely federal action is also needed on locomotives and ocean going vessels. EPA has also been petitioned to act on locomotives but has to date failed to initiate rulemaking. Given the severity of South Coast AQMD's ozone air quality problem, and the level of reductions needed by 2023 to meet the 80 ppb ozone standard, NO_x reductions from these sources are paramount and necessary to achieve clean air. While federal regulatory actions to achieve the remaining level of

reductions for attainment in 2023 would provide assurance that the reductions are achieved, in lieu of this, significant federal incentive funding could also result in emissions reductions from the federal sources.

c. Defined Measures to Reduce NOx from Federal and International Sources

California has identified the following actions regarding sources under federal and international control that are needed to usher in the cleanest technology and to address these sources’ emissions, which are either increasing or not keeping pace with reductions in other sectors in the Basin. These measures represent the transition to cleaner technologies that is needed in all sectors to achieve the goals set forth in this document and to achieve air quality standards in the future. The emissions reductions from these measures represent complete transitions of these fleets and the maximum potential reductions from these sources. Thus, they may achieve more reductions than necessary to meet the standard if every single measure were implemented to the maximum extent. In any case, some combination of these federal measures are necessary, through regulations, incentives or other means, for California to achieve the final increment of emissions reductions needed to meet the 1997 ozone standard. These measures and the extent of the NOx emissions reductions that can be achieved from them are summarized in the Table 5-3. More developed measures follow in the next section. While the first federal measure addressing heavy duty diesel trucks is reliant on U.S. EPA adopting a low-NOx truck standard for all new trucks, each of the federal measures described below includes turnover of existing fleet to the cleanest technology. The accelerated penetration of the clean technology into the fleet could be implemented via regulation, incentives, voluntary agreements, or a combination of these approaches. We estimate that it could cost at least \$6 billion to achieve emission reductions from sources under federal authority / responsibility as described below.

Table 5-3
Potential Federal Measures

Measures	Measure Description	2023 NOx Reductions (tpd)
Low-NOx Heavy-Duty Vehicles	Heavy-duty vehicles (above 14,000 lbs. GVWR) powered by low-NOx standard in 2023	Up to 35
Low-NOx Ocean-Going Vessels	Ocean-going vessels coming to California powered by Tier 3 engines in 2023	Up to 28
Low-NOx Locomotives	Locomotives coming to California powered by Tier 4 engines in 2023	Up to 11
Low-NOx Aircraft	Aircraft NOx reductions assumption of 20% if emissions are held at 2012 levels.	Up to 4
Total Reductions		Up to 78

i. Accelerate Implementation of Federal Low-NO_x Heavy-Duty Truck Standard

Description of Source Category

This measure addresses low-NO_x engines for onroad heavy-duty engines used in class 4 through 8 medium-and heavy-duty trucks. Most of the NO_x emissions from heavy-duty engines come from diesel engines, especially in the higher weight classes. Gasoline and natural gas Otto cycle spark-ignited engines are also used in heavy-duty trucks, to a lesser extent, and primarily in the lower weight classification vehicles. Medium and heavy-duty trucks are currently the fastest growing transportation sector in the United States, and are responsible for 25 percent of South Coast's NO_x emissions.

Background / Regulatory History

California is the only state with the authority to adopt and enforce emission standards for new motor vehicle engines that differ from the federal emission standards. Since 1990, heavy-duty engine NO_x emission standards have become dramatically more stringent, dropping from 6 grams per brake horsepower-hour (g/bhp-hr) in 1990 down to the current 0.2 g/bhp-hr standard, which took effect in 2010. Starting in 2015 in California, engine manufacturers could certify to three optional NO_x emission standards of 0.1 g/bhp-hr, 0.05 g/bhp-hr, and 0.02 g/bhp-hr (i.e., 50 percent, 75 percent, and 90 percent lower than the current mandatory standard of 0.2 g/bhp-hr). The optional California standards allowed local air districts and CARB to preferentially provide incentive funding to buyers of cleaner trucks, which encouraged the development of cleaner engines. While California has the authority to regulate the engine standards for trucks sold in California, about 60 percent of total heavy-duty vehicle miles traveled in the South Coast on any given day are by trucks that were purchased outside of California. For this reason, it is critical that U.S. EPA establish a new national low-NO_x standard for heavy-duty trucks. In response to petitions for a low-NO_x rulemaking from over 20 organizations including state and local air agencies from across the country, on November 13, 2018, U.S. EPA announced the "Cleaner Truck Initiative" to develop regulations to further reduce NO_x emissions from on-road heavy-duty trucks and engines. However, it is not clear whether the proposed rulemaking will result in early reductions.

Proposed Actions

With a federal low-NO_x standard for all new heavy-duty trucks sold nationwide proposed to begin in 2024, all trucks traveling within California would eventually be equipped with an engine meeting the low-NO_x standard. However, to meet the 2023 ozone standard, all heavy-duty trucks above 14,000 lbs. operating in the Basin must have low NO_x engines by 2023. U.S. EPA would thus need to adopt the low-NO_x standard to be in effect in 2022 and develop a

strategy, through incentives or other actions, to turn over the fleet of vehicles registered outside of California and operating in the Basin ahead of the mandated standard.

Possible Emission Reductions: Up to 35.7 tpd of NO_x

ii. Accelerate Implementation of Tier 3 Ocean Going Vessels

Description of Source Category

OGVs are large vessels designed for deep water navigation and include large cargo vessels such as container vessels, tankers, bulk carriers, and car carriers, as well as passenger cruise vessels. These vessels transport containerized cargo; bulk items such as vehicles, cement, and coke; liquids such as oil and petrochemicals; and passengers. OGVs travel internationally and may be registered by the U.S. Coast Guard (U.S. flagged), or under the flag of another country (foreign-flagged). The majority of vessels that visit California ports are foreign-flagged vessels.

Background/Regulatory History

While OGVs are a large contributor of NO_x in the South Coast, both South Coast AQMD and the State have little authority to regulate this source. Regulation of these emissions is under the authority of the International Maritime Organization (IMO). The IMO Annex VI (“Regulations for the Prevention of Air Pollution from Ocean-going ships”) specifies new engine NO_x standards and sets fuel sulfur limits. Tier 2 IMO NO_x standards have applied to new vessels since 2011, and in 2016, Tier 3 NO_x standards applied within NO_x Emission Control Areas (ECAs) such as the North American ECA. Unfortunately, under current conditions, Tier 3 marine engines are not expected to infiltrate the South Coast ports in significant number until 2030 to 2040.¹⁰ This delayed arrival is a result of 1) few Tier III vessels being in service as OGV fleets turn over slowly, and 2) shipping companies generally assigning the new OGVs to the Asia to Europe routes instead of trans-Pacific routes. The delay in the production of Tier III OGVs are also caused by a significant increase in keels laid prior to Tier III standard deadline, allowing for “new” vessels to be constructed to Tier II standards.

Proposed Actions

U.S. EPA would advocate with international partners for the IMO to require extensive deployment of OGVs meeting Tier 3 NO_x standards operating in the waters off the South Coast Air Basin by 2023. The measure could be implemented via regulation, incentives, voluntary agreements, or a combination of these approaches.

Possible Emission Reductions: Up to 28.2 tpd of NO_x

¹⁰ Mercator International LLC, San Pedro Bay Long-term Unconstrained Cargo Forecast, July 12, 2016

iii. Accelerate Implementation of Tier 4 In-Use Locomotives

Description of Source Category

There are three major categories of freight locomotives that BNSF and Union Pacific operate both nationally and in California. The first category is interstate line haul locomotives, which are primarily approximately 4,400 horsepower. The second category is made up of medium-horsepower (MHP) locomotives, as defined by CARB staff as typically between 2,301 and 3,999 horsepower. MHP locomotives are typically older line haul locomotives that have cascaded down from interstate service. And lastly, there are switch (yard) locomotives, specifically defined by U.S. EPA as between 1,006 and 2,300 horsepower.

Locomotives operating at railyards and traveling through California are a significant source of emissions of NO_x, diesel PM, and GHGs. In addition, these emissions often occur in or near densely populated areas and neighborhoods, exposing residents to unhealthy levels of pollutants. The long useful life of locomotive engines means that natural turnover of engines to cleaner technology can take decades.

Background/Regulatory History

In 1998, U.S. EPA approved the initial set of national locomotive emission regulations. These regulations primarily emphasized NO_x reductions through Tier 0, 1, and 2 emission standards. Tier 2 NO_x emission standards reduced older uncontrolled locomotive NO_x emissions by up to 60 percent (i.e., from 13.2 to 5.5 g/bhp-hr). CARB, along with the California Railroads and the U.S. EPA, signed a MOU in July 1998 that included provisions for early introduction of clean units, with requirements for a fleet average in the South Coast equivalent to U.S. EPA's Tier 2 locomotive standard by 2010.

In 2008, U.S. EPA approved a second set of national locomotive regulations. New, and older locomotives upon remanufacture, were required to meet more stringent particulate matter (PM) and NO_x emissions standards. Both new Tier 3 and the remanufactured “Plus” standards result in 50 percent or more reductions in PM than the original Tier 0-2 PM emission standards. These standards also provided a small NO_x benefit.

The 2008 regulations also included new Tier 4 (2015 and later model years) locomotive NO_x and PM emissions standards. The U.S. EPA Tier 4 NO_x and PM emissions standards further reduced emissions by approximately 95 percent from uncontrolled levels.

For the 2007 California State Strategy, CARB proposed a measure requesting U.S. EPA to replace existing locomotive engines with Tier 4 engines beginning in 2012 and conducting concurrent rebuilds of older engines to Tier 2.5 standards. CARB estimated

that by 2023, the measure would reduce NO_x by 70 percent from the locomotive fleet in the South Coast. Although U.S. EPA has failed to initiate such action, this measure demonstrates the need for U.S. EPA to act on replacing locomotives in the Basin with Tier 4 locomotives.

Even with U.S. EPA setting the Tier 4 Standard, there have been a minimal number of Tier 4 locomotives visiting the South Coast. In 2017, CARB petitioned U.S. EPA to exercise its authority to adopt more stringent emission standards for locomotives to lower emissions of toxic and criteria air pollutants beyond Tier 4 levels. CARB requested promulgation of updated emission standards, including standards for newly manufactured locomotives and standards for emissions upon remanufacture. To date, U.S. EPA has failed to initiate such action. U.S. EPA rulemaking to tighten the national locomotive emission standards beyond the current Tier 4 requirements is the most efficient and cost-effective path. Such U.S. EPA action would not only support attainment of the 80 ppb ozone standard in the Basin but also local environmental justice initiatives in rail-impacted communities.

Proposed Actions

U.S. EPA would accelerate the turnover or repower of in-use locomotives in the South Coast to achieve extensive deployment of Tier 4 or better emission levels by 2023. This strategy may be executed through a regulation, incentives or other approaches to increase the turnover rate of in-use interstate, regional and switch locomotives to lower NO_x emission locomotives that meet Tier 4 or better emission levels.

Possible Emission Reductions: Up to 11.2 tpd of NO_x

iv. Low-NO_x Aircraft

Description of Source Category

There are five commercial airports in the South Coast. NO_x emissions from aircraft has grown dramatically over the past 20 years. In 2000, aircraft only contributed a little more than 1 percent of the mobile NO_x emissions in the Basin. By 2023, NO_x emissions from aircraft are projected to be responsible for 8 percent of the NO_x emissions in the Basin. And while total mobile NO_x emissions will be reduced in the South Coast by close to 80 percent of 2000 NO_x values in 2023, aircraft NO_x emissions will increase by almost 60 percent in that time period.

Background / Regulatory History

In 2012, U.S. EPA adopted emission standards for aircraft gas turbine engines with rated thrusts greater than 26.7 kilonewtons, primarily used on commercial passenger and freight aircraft. The requirements were previously adopted by the International Civil Aviation Organization (ICAO) and included two new tiers of more stringent emission standards for nitrogen oxides (NO_x). These are referred to as Tier 6 standards and Tier 8 standards. The Tier 8 standards apply to engines in the United States for which the first individual production model is manufactured after December 31, 2013. Overall, Tier 8 represents an approximate 15 percent reduction in NO_x emissions from Tier 6.

Proposed Actions

U.S. EPA would require engines in aircraft visiting airports in the Basin to substantially lower their NO_x emissions.

Possible Emission Reductions: Initial reductions are based on a range of reductions from a no growth assumption from 2012 to an assumption that Aircraft NO_x reductions can be in line with other Heavy-duty transportation sources, i.e. Heavy Duty Diesel Vehicles, locomotives, and OGVs. If emissions are held at 2012 levels, 3.52 tpd of NO_x reductions can be achieved in 2023, and if emissions are reduced by 63%, 10.9 tpd reductions of NO_x can be achieved in 2023. This strategy may be executed through a regulation, incentives or other approaches.

6. CALIFORNIA ENVIRONMENTAL QUALITY ACT

South Coast AQMD, as Lead Agency, has reviewed the project pursuant to the California Environmental Quality Act (CEQA) and has determined that the proposed Contingency Measure Plan is considered a later activity within the scope of the project covered by the March 2017 Final Program Environmental Impact Report (PEIR) for the 2016 Air Quality Management Plan (AQMP) because no substantial changes or revisions to the project are necessary and no new significant environmental effects and no substantial increase in the severity of previously identified significant effects will occur as result of this later activity. As such, in accordance with CEQA Guidelines Section 15168(e)(2), the March 2017 Final PEIR for the 2016 AQMP adequately describes and analyzes the environmental effects of the project for the purposes of CEQA. Thus, no new environmental document is required pursuant to CEQA Guidelines Section 15168(c) and no subsequent CEQA document is required pursuant to CEQA Guidelines Section 15162.

Mitigation measures were included in the March 2017 Final PEIR and were made a condition of approval of the 2016 AQMP. A Mitigation, Monitoring, and Reporting Plan, pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097, was required and adopted for the 2016 AQMP. No new or modified mitigation measures will be made as a condition of the approval of this later activity. However, the mitigation measures that were made a condition of approval of the 2016 AQMP as analyzed in the March 2017 Final PEIR and the corresponding Mitigation, Monitoring, and Reporting Plan that was adopted at that time will remain in effect. In addition, Findings pursuant to CEQA Guidelines Section 15091 and a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 which were required and adopted for the 2016 AQMP, will remain in effect.

The March 2017 Final PEIR for the 2016 AQMP and supporting documentation for the record of project approval, including Findings, the Statement of Overriding Considerations, and the Mitigation, Monitoring, and Reporting Plan, may be examined at:

<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
or South Coast AQMD, 21865 Copley Drive, Diamond Bar, CA 91765.

7. SOCIOECONOMIC ANALYSIS

A socioeconomic assessment is not required under Health & Safety Code section 40440.8(a) which applies to rules. Also, the impacts from the Contingency Measure Plan fall within the scope of the Socioeconomic Report for the 2016 AQMP.

8. PUBLIC PROCESS

Development of the Draft Contingency Measures Plan was conducted through a public process. South Coast AQMD staff held a Public Workshop at South Coast AQMD Headquarters in Diamond Bar on October 18, 2019, to solicit information, comments, and suggestions from the public, affected businesses and stakeholders. Furthermore, the 2022 AQMP Advisory Group provided feedback and recommendations on the draft Contingency Measure Plan. The Advisory Group represents a diverse cross section of stakeholders such as large and small businesses, government agencies, environmental and community groups, and academia. The Draft Contingency Measure Plan was presented to the AQMP Advisory Group on October 9, 2019 and to the Mobile Source Committee on October 18, 2019. The Draft Final Contingency Measure Plan incorporating the public comments will be presented to the AQMP Advisory Group and the Mobile Source Committee on November 21, 2019 and November 15, 2019 respectively. A Public hearing will also be held at the South Coast AQMD Headquarters on December 6, 2019. Following the South Coast AQMD Governing Board approval, the Contingency Measure Plan will be submitted to CARB. CARB will consider adoption of the Contingency Measure Plan at its December 12 -13, 2019 Board hearing in Sacramento. If adopted, CARB staff will submit the Contingency Measure Plan to U.S. EPA for inclusion into the SIP.

9. RESPONSE TO COMMENTS

From: Alyssa Beltran [mailto:ABeltran@ph.lacounty.gov]
Sent: Tuesday, October 29, 2019 4:42 PM
To: AQMPTeam <AQMPTeam@aqmd.gov>
Cc: Katie Butler <KButler@ph.lacounty.gov>; Charlene Contreras <chcontreras@ph.lacounty.gov>; Janet Scully <jscully@ph.lacounty.gov>; Cyrus Rangan <crangan@ph.lacounty.gov>
Subject: LAC DPH Comments on Draft Contingency Measure Plan for the 1997 Ozone Standard

Hello SCAQMD,

As a member of the 2022 AQMP Advisory Group, Los Angeles County Department of Public Health (Public Health) is providing comments on the Draft Contingency Measure Plan for the 1997 Ozone Standard. Public Health recommendations are listed below for consideration.

1. **Land Use:**
 - A. Proposed and existing land use improvements (i.e. I-5 & proposed I-710 expansions) could impact nitrogen oxides (NOx) & ozone emissions in the South Coast Air Basin (Basin). As designed, these improvements could increase traffic speeds which in general would decrease vehicle emissions in the affected areas. Other improvements which may result in emissions reductions involve adjoining streets to improve traffic flow, adding special lanes for freight vehicles, etc. Will the Draft Contingency Measure Plan address and quantify anticipated emissions reductions in NOx and ozone as a result of land use changes? 1-1
 - B. The Sacramento Metropolitan Air Quality Management District has a guide (updated in 2016) for California Environmental Quality Act (CEQA) practitioners that provides easily accessible tools to quickly identify and analyze proposed development projects that may have a significant adverse effect on local air quality. Public Health urges South Coast to consider their role in the CEQA process and the ways in which the Draft Contingency Measure Plan can account for identified emissions increases or reductions in NOx and ozone due to development projects. 1-2
2. **Climate Change:**
 - A. It is noted that "South Coast AQMD is currently conducting a study to analyze meteorological factors and trends to explain the poor air quality observed in the recent years despite continuing and demonstrable reductions in emissions". The effects of climate change will impact the trajectory for attainment of the 1997 8-Hour Ozone standard and subsequent standards. Public Health agrees that this study is necessary to inform our understanding of future climate-related increases in NOx and ozone emissions in the Basin. The estimation of anticipated emissions reductions from future advanced technologies must account for potential climate-related increases in NOx and ozone. 1-3
3. **Hot Spots:**
 - A. Several environmental justice/health equity-related resources have been published since the 2016 Air Quality Management Plan. These include, but are not limited to, the Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 and the Los Angeles County's Environmental Justice Screening Method tool. Public Health recommends South Coast to consider these resources as a means of identifying hot spots in the Basin. Similar to what is being done through AB617, South Coast can tailor emissions reductions strategies in heavily burdened communities where significant improvements in air quality (and health) can be achieved. 1-4

Kindly confirm receipt of comments.

Regards,
Alyssa

Alyssa Beltran, MPH
 Environmental Scientist
 Toxicology and Environmental Assessment Branch
 Los Angeles County Department of Public Health

Response to Comment 1-1

The Contingency Measure Plan has been prepared to address the contingency measure requirements of Clean Air Act (CAA) section 182(e)(5) for the 1997 8-hour ozone NAAQS for the Basin. The goal of this Plan is to provide the emissions reductions needed to achieve the 108 tpd of NOx reductions allocated to section 182(e)(5) measures. Land use improvements are an integral part of air quality planning and future improvements would be considered in the development of the next Air Quality Management Plan to the extent that they are included in SCAG's 2020 Regional Transportation Plan.

Response to Comment 1-2

The comment refers to the Guide to Air Quality Assessment in Sacramento County that was developed by Sacramento Metropolitan Air Quality Management District. It is important to note

that this guide is intended for land use projects within Sacramento County¹¹. The South Coast AQMD has a similar document plus other online reference materials and guidance for evaluating land use projects under CEQA within South Coast AQMD's jurisdiction. CEQA practitioners are recommended to visit South Coast AQMD's CEQA webpage at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

The proposed project is located within South Coast AQMD's jurisdiction, and not within Sacramento County. Thus, the Guide to Air Quality Assessment in Sacramento County is not applicable to the proposed project. As explained in Chapter 6 of this staff report, South Coast AQMD, as lead agency, considered CEQA and evaluated the proposed project accordingly. South Coast AQMD staff determined that the proposed Contingency Measure Plan is considered a later activity within the scope of the project previously evaluated in the March 2017 Final Program Environmental Impact Report (PEIR) for the 2016 Air Quality Management Plan (AQMP) such that no new environmental document would be required pursuant to CEQA Guidelines Section 15168(c) and no subsequent CEQA document would be required pursuant to CEQA Guidelines Section 15162.

Response to Comment 1-3

Thank you for the comments in regards to the on-going study being funded by the South Coast AQMD to analyze meteorological factors and trends in the recent years. Persistent episodes of high ozone and PM_{2.5} concentrations, coupled with more frequent and record-breaking high temperatures in recent years, raise the question as to whether the regional climate in the SCAB is changing in such a manner that weather conditions leading to poor air quality will become more frequent in the future. Understanding the meteorological factors that contributed to the recent higher ozone events and comparing recent weather trends with predicted global climate change scenarios can assist in answering this important question, and informing the development of more effective strategies for improving air quality and protecting public health. The study is currently underway and is anticipated to be completed in fall 2020. The study results will be available to the public and will be considered in the development of the next Air Quality Management Plan.

Response to Comment 1-4

South Coast AQMD staff appreciates the concerns raised on environmental justice and health equity resources ensuring priority for reducing emissions in environmental justice areas and staff agrees that environmental justice communities should continue to be a priority. South Coast AQMD will continue to use the best available tools to identify environmental justice areas and disadvantaged communities as part of air quality planning and through implementation of AB617

¹¹ Sacramento Metropolitan Air Quality Management District, Guide to Air Quality Assessment in Sacramento County, <http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>; accessed November 1, 2019.

and other programs, prioritize these communities in emission reductions strategies and incentive programs.



November 1, 2019

Britney C. Gallivan
Air Quality Specialist
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

Re: Draft Contingency Measure for the 1997 Ozone Standard

Dear Ms. Gallivan:

On behalf of Earthjustice and Sierra Club, I submit comments on the Draft Contingency Measure Plan for the 1997 Ozone Standard. Overall, the need for this plan to achieve such a significant amount of pollution reductions at the back end of a 20-year ozone planning horizon confirms the warnings several organizations put into comments on the 2007 AQMP that the use of section 182(e)(5) "black box" measures provide breathers in the region an unfavorable tradeoff. Even worse, many of the emissions reductions promised by 2023 have never actually materialized meaning we will continue to breathe air that does not even meet the standard determined clean two cycles ago. The contingency measure plan needs additional measures to achieve the significant gap in attainment through a robust set of regulatory and other enforceable strategies. The following recommendations provide additional areas where emissions reductions are needed when our region fails to meet the 1997 ozone standard.

Residential Fuel Combustion

The contingency measure plan should have additional commitments to achieve emissions reductions from regulatory measures aimed at reducing and/or eliminating emissions from residential fuel combustion. In the 2023 and 2031 summer planning NOx inventories, residential fuel combustion amounts to 9 tons per day ("tpd") of NOx emissions. CMB-02 from the 2016 AQMP is only designed to achieve 1.1 tpd and 2.8 tpd of NOx reductions by 2023 and 2031 respectively. This leaves ample room for a commitment to tighten emissions standards for a range of appliances, including water heaters, stoves, dryers, pool heaters, and other equipment. In addition to inclusion of this type of commitment in the contingency measure plan, the South Coast AQMD should immediately begin a regulatory process to tighten emissions standards for the appliances that are the biggest culprits in this significant amount of NOx emissions from the residential fuel combustion sector. Finally, the plan needs to include a provision that all new development should not include combustion appliances because we need to start thinking about how do we make sure we are not making our air pollution problems worse as new development occurs.

} 2-1

NOx RECLAIM

Initially, we appreciate the South Coast AQMD staff's significant efforts to dismantle the utterly broken NOx RECLAIM program. We are encouraged by the inclusion of additional emissions reductions in this contingency measure plan, but we encourage the South Coast AQMD to achieve even more emissions reductions. The California Supreme Court has been clear that Best Available Retrofit Control Technology can be technology forcing. Despite this direction, much of the current conversion to command and control in the NOx RECLAIM program simply amounts to requirements for installing already existing and available technologies. The contingency measure plan should include additional emissions reduction measures centered around forcing the next generation of cleaner and even zero-emissions technologies at NOx RECLAIM facilities.

2-2

Transportation Planning

The current plan is lacking in real commitments to achieve reductions in NOx emissions from our transportation system. The plan should commit to more measures to achieve two goals: 1) reduction in Vehicle Miles Traveled ("VMT") and 2) advancing zero-emission transportation infrastructure. Because our transportation plan for decades has assumed we will close the black box, we have built a transportation system untethered from the reality of how we need to put our transportation dollars to work in solving our air pollution crisis. As such, we recommend including a measure to reduce the NOx Motor Vehicle Emissions Budgets if we fail to attain the 1997 ozone standard by 20% or more. By reducing the NOx budget, the Southern California Association of Governments ("SCAG") would need to produce a plan more reflective of the reality that we cannot continue to build a transportation system that makes solving our air pollution crisis more difficult.

2-3


Transportation Control Measures (TCMs)

The plan should include a commitment to adopt additional TCMs. In particular, the South Coast should use its authority under section 182(e)(4) of the Clean Air Act that allows TCMs "applicable during heavy traffic hours to reduce the use of high polluting vehicles or heavy-duty vehicles, notwithstanding any other provision of law." Other TCMs should be included to provide additional benefits and perks to use zero-emissions equipment in freight impacted communities.

2-4

We appreciate your consideration of these comments, and we look forward to working with the South Coast AQMD to actually meet an ozone standard.

Sincerely,



Adriano L. Martinez
Earthjustice

Response to Comment 2-1

Staff agrees that reducing, managing, and changing the way energy is used in the residential sectors can provide additional NO_x emission reductions, and will continue to seek those opportunities. With the understanding of the potential emission reductions from the residential and commercial sector, the 2016 AQMP includes control measures for the applications of zero or near-zero NO_x emissions appliances in the residential and commercial sectors (CMB-02), additional enhancements in reducing energy use in existing residential buildings (ECC-03), and co-benefits from existing residential and commercial building energy efficiency mandates (ECC-02). CARB is also accounting for the co-benefits for measures associated with the 2017 Climate Change Scoping Plan, which include measures pertaining to appliance technology substitution; electricity demand reduction, and improving electrical efficiency in industry, agriculture, residential, and commercial lighting; and residential air conditioning, freezing, and refrigeration. South Coast AQMD will continue to evaluate opportunities for additional feasible NO_x reductions in existing and new residential and commercial buildings, including potential rulemaking in the 2020-2022 timeframe. Any potential surplus reductions achieved beyond the South Coast AQMD's aggregate reduction commitments in 2023 can be applied toward the reductions claimed under section 182(e)(5) measures and attainment in 2023.

Response to Comment 2-2

The adoption resolution for the 2016 AQMP directed staff to achieve five tpd of NO_x emission reductions as soon as feasible but no later than 2025, and to transition the RECLAIM program to a command-and-control regulatory structure requiring BARCT as soon as practicable (CMB-05). Given the progress made in the NO_x RECLAIM transition, it is anticipated that a portion of the emission reductions from CMB-05 could be achieved earlier (by 2023). Therefore, in this Contingency Measure Plan, 2 out of the 5 tpd of NO_x emission reductions from CMB-05 are allocated as part of the South Coast AQMD Identified Emission Reduction Strategies towards section 182(e)(5) commitments.

As facilities transition out of NO_x RECLAIM, a command-and-control rule that includes NO_x emission standards reflecting BARCT is needed for all equipment categories. The BARCT assessment consists of a multi-step analysis, including technology assessments where staff reviews current South Coast AQMD regulatory requirements, surveys other air districts and agencies outside of the South Coast AQMD's jurisdiction to identify emission limits that exist for similar equipment, and identifies and assesses pollution control technologies to determine what degree of reduction could be achievable for the affected sources. Based on the collected information, initial BARCT emission limits are established. Once the initial BARCT emission limits are determined, a cost-effectiveness analysis is conducted. The BARCT assessment, as part of each rule development process, is conducted through a public process which takes into account comments, concerns and input from a cross section of stakeholders including representatives from affected businesses, environmental groups, public agencies, consultants, and other interested parties. Thus, BARCT is implemented as the RECLAIM program is

transitioned into a command-and-control regulatory structure. Staff will continue to evaluate BARCT periodically for equipment categories to assess technological changes that may reflect lower emission limits.

Response to Comment 2-3

Section 40717 of the Health and Safety Code establishes a process for air district involvement in developing transportation control measures and the emission reduction goals for the Regional Transportation Plan. Currently, the 2016 AQMP reflects the emission benefits associated with SCAG's Final 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Section 176(c) of the CAA establishes transportation conformity requirements to ensure that transportation activities do not interfere with attaining and maintaining air quality standards. Motor vehicle emissions budgets are the mechanism for ensuring that transportation planning activities conform to the SIP. The long-term transportation planning requirements for emission reductions from onroad mobile sources within the Basin are met by SCAG's Regional Transportation Plan (RTP), which is developed every four years with a 20-year planning horizon.

In this Contingency Measure Plan, CARB is committing to achieve 3 tpd of NO_x reductions as part of the Innovative New Measures, which also includes measures for reduction in growth of single-occupancy vehicle travel, VMT and land conservation, and regional VMT reductions (more details in Section 3c). Emission reductions from these measures will be applied toward the 182(e)(5) commitment. Staff agrees that there could be additional opportunities for emission reductions transportation; however, we note that the NO_x emission benefits from VMT reduction strategies are likely modest. Staff will work with SCAG and other stakeholders on the next RTP to evaluate future potential emission reduction opportunities for VMT reductions and advancement of cleaner transportation options for inclusion into the 2022 AQMP, and reflection in the transportation conformity emissions budgets for future years. Staff welcomes input from stakeholders concerning what methods may be used to reduce VMT, as well as additional efforts to reduce vehicle emissions, and thus allow the implementation of lower transportation conformity budgets in the future.

Response to Comment 2-4

The commenters request that the South Coast AQMD staff propose transportation control measures as authorized by Section 182(e)(4) of the CAA [42 U.S.C. Section 7511a(e)(4)], which provides that an extreme area's state implementation plan "may contain provisions establishing traffic control measures applicable during heavy traffic hours to reduce the use of high-polluting vehicles or heavy duty vehicles, notwithstanding any other provision of law." In the early 1990's, South Coast AQMD staff worked on developing such a measure to apply to heavy-duty trucks. However, Section 246(h) of the CAA [42 U.S.C. Section 7586(h)] appears to limit Section 182(e)(4), by providing that "The Administrator shall by rule, within 1 year after November 15, 1990, ensure that transportation control measures including time-of-day or day-of-week restrictions, and other similar measures that restrict vehicle usage, do not apply to any clean-fuel vehicle that meets the requirement of this section. This subsection shall apply notwithstanding subchapter 1 of this chapter." The section allowing extreme areas to implement time-of-day restrictions for heavy-duty vehicles is included in subchapter 1. Therefore, even though Section 182(e)(4) states that it applies "notwithstanding any other provision of law," that section is in reality limited by Section 246(h).

EPA actually issued its regulation exempting clean fuel heavy-duty vehicles from time-of-day transportation control measures on March 1, 1993. 58 Fed. Reg. 11888, “Clean Fuel Fleet Credit Programs, Transportation Control Measure Exemptions, and Related Provisions.” EPA explained that “eligible clean-fuel fleet vehicles would be exempt from measures which forbid vehicle transit only during certain hours of the day, days of the week, days of the month, or during other defined periods of time...” 58 Fed. Reg. 11888, 11895 col. 3. Thus, eligible clean fuel vehicles would be exempt from any measure in an extreme area that limits vehicle travel based on time of day, such as that referred to in Section 182(e)(4). *Id.* EPA proposed its standards for clean fuel heavy-duty vehicles on June 10, 1993, at 3.5 g/bhp/hr NOx. 58 Fed. Reg. 32474, 32489 c. 3. EPA finalized its clean fuel fleet standard for heavy-duty vehicles at 3.8 g/bhp/hr for Federal fuel and 3.5 g/bhp/hr for California fuel. 40 C.F.R. Section 88.105-94. Currently, heavy-duty diesel fleets are phasing in the 2010 model year standard, which requires a maximum of 0.2 bhp/hr NOx. The Federal 2010 standard is the same. Transportpolicy.net/standard/California-heavy-duty-emissions. Thus it is highly likely that any truck operating in the South Coast region today will meet or exceed the outdated “clean fuel” standard and thus be exempt from time-of-day transportation controls.

In any event, staff is uncertain about the possible emissions benefit to be derived from time-of-day limits on heavy-duty-trucks, which appear to be shifting as much of their travel as possible to off-peak hours already. Any such program would not eliminate emissions, but primarily move them to a different time of day, so that the only real emission benefit would be from reduced congestion.