



**South Coast  
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765

(909) 396-2000, [www.aqmd.gov](http://www.aqmd.gov)

**SPECIAL MOBILE SOURCE COMMITTEE MEETING**

**Committee Members**

Dr. Clark E. Parker, Sr., Chair

Dr. Joseph Lyou, Vice Chair

Supervisor Marion Ashley

Mayor Larry McCallon

Mayor Pro Tem Judith Mitchell

Supervisor Hilda Solis

**February 16, 2018 ♦ 8:30 AM ♦ GB  
21865 Copley Dr., Diamond Bar, CA 91765**

**TELECONFERENCE LOCATION(S)**

11461 West Sunset Boulevard  
Brentwood Room 1  
Los Angeles, CA 90049

4080 Lemon Street,  
5th Floor, Conf. Room D  
Riverside, CA 92502

**(The public may attend at any location listed above.)**

*Call-in for listening purposes only is available by dialing:*

*Toll Free: 866-244-8528*

*Listen Only Passcode: 5821432*

*In addition, a webcast is available for viewing and listening at:*

*<http://www.aqmd.gov/home/library/webcasts>*

**AGENDA**

**CALL TO ORDER**

**INFORMATIONAL ITEM (Item 1)**

**1. Potential Strategies for Facility Based Mobile Source Measures Adopted in Final 2016 AQMP (No Motion Required)**

Staff will report on the recommended approach tailored to each of the five facility sectors including airports, marine ports, new and redevelopment projects, rail yards, and warehouses.

Ian MacMillan  
*Planning & Rules  
Manager*

**WRITTEN REPORTS (Items 2-3)**

**2. Rule 2202 Activity Report: Rule 2202 Summary Status Report**

The Rule 2202 Summary Status Report summarizes Rule 2202 activities for the period January 1, 2018 to January 31, 2018. The report breaks down the plan submittal activities by option type and lists Air Quality Investment Program funds collected by county.

Philip Fine  
*Deputy Executive  
Officer*

**3. Lead Agency Projects and Environmental Documents Received by SCAQMD**

This report provides, for the Board's consideration, a listing of CEQA documents received by the SCAQMD between January 1, 2018 and January 31, 2018, and those projects for which the SCAQMD is acting as lead agency pursuant to CEQA.

Philip Fine

**OTHER MATTERS**

**4. Other Business**

Any member of the Committee, or its staff, on his or her own initiative or in response to questions posed by the public, may ask a question for clarification, may make a brief announcement or report on his or her own activities, provide a reference to staff regarding factual information, request staff to report back at a subsequent meeting concerning any matter, or may take action to direct staff to place a matter of business on a future agenda. (Gov't. Code Section 54954.2)

**5. Public Comment Period**

Members of the public may address this body concerning any agenda item before or during consideration of that item (Gov't. Code Section 54954.3(a)). All agendas for regular meetings are posted at District Headquarters, 21865 Copley Drive, Diamond Bar, California, at least 72 hours in advance of a regular meeting. At the end of the regular meeting agenda, an opportunity is also provided for the public to speak on any subject within the Committee's authority. Speakers may be limited to three (3) minutes each.

**6. Next Meeting Date: March 16, 2018**

**ADJOURNMENT**

**Americans with Disabilities Act**

*The agenda and documents in the agenda packet will be made available, upon request, in appropriate alternative formats to assist persons with a disability (Gov't. Code Section 54954.2(a)). Disability-related accommodations will also be made available to allow participation in the Mobile Source Committee meeting. Any accommodations must be requested as soon as practicable. Requests will be accommodated to the extent feasible. Please contact Arlene Farol at 909.396.2250 from 7:30 a.m. to 6:00 p.m., Tuesday through Friday, or send the request to [afarol@aqmd.gov](mailto:afarol@aqmd.gov).*

**Document Availability**

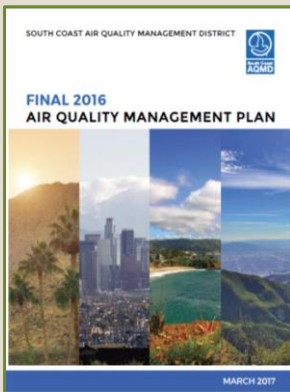
*All documents (i) constituting non-exempt public records, (ii) relating to an item on an agenda for a regular meeting, and (iii) having been distributed to at least a majority of the Committee after the agenda is posted, are available prior to the meeting for public review at the South Coast Air Quality Management District, Public Information Center, 21865 Copley Drive, Diamond Bar, CA 91765.*

# 2016 AQMP Facility-Based Mobile Source Measures Draft Staff Recommendations



Mobile Source Committee  
February 16, 2018

## Background

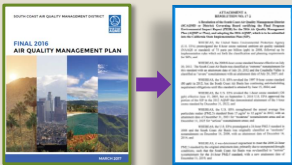


- 5 Facility-Based Mobile Source Measures (FBMSM) included in 2016 AQMP
  - Airports, New/Redevelopment, Ports, Railyards, Warehouses
- Primary goal of FBMSM is to reduce emissions of NO<sub>x</sub> to address worst ozone in the nation
  - Assists in implementing CARB's mobile source strategy "Further Deployment" control measures
  - Federal Clean Air Act requires the District to meet the NAAQS "as expeditiously as practicable"
  - State law requires meeting the CAAQS at the "earliest practicable date" using "every feasible measure"

## Board Direction in Adoption of AQMP



- Board provided direction in adoption of AQMP
- *“identify specific emission reduction actions for each of the facility-based measures...”* and *“...initiate rule development for stationary and mobile sources unless sufficient actions have been identified as part of the public process in implementing the facility-based measures....”*



## Facility Based Mobile Source Measures Process

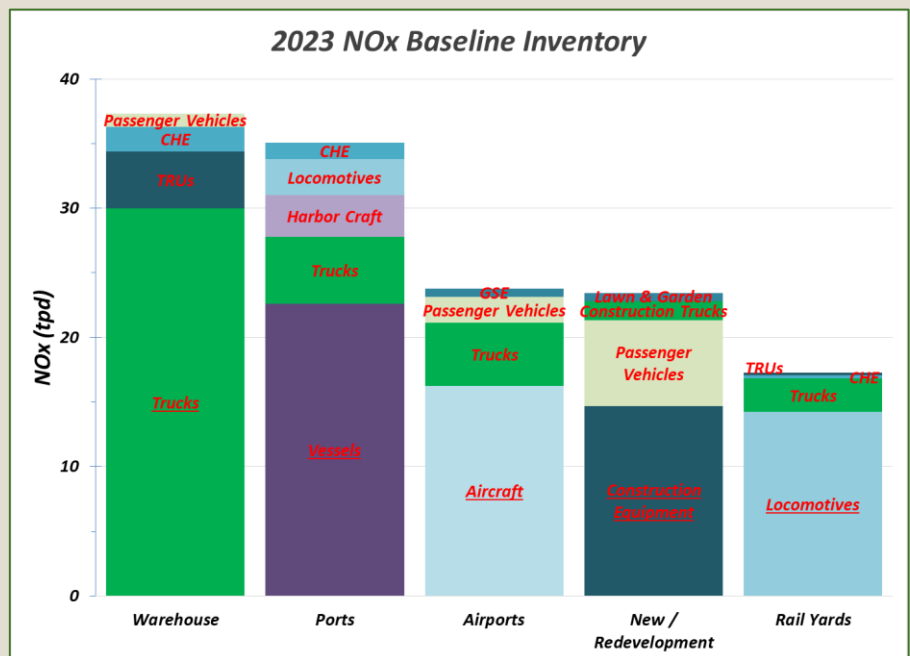
- Consistent with process described in 2016 AQMP, staff has held 17 working groups over the past year
- Focus has been to first identify potential voluntary approaches that can result in SIP creditable emission reductions
- Initial discussions on potential regulatory approaches included in most recent working groups

# Key Strategies for Incentives

- Current increased level of funding needs to be spent quickly to achieve emission reductions as soon as possible, and to demonstrate need
  - Opportunity to ‘jump’ technologies (e.g., replace a 2007 truck with ZE/NZE instead of 2010 truck)
- Significant additional incentive funding needed
- New incentive strategies
  - Pursue opportunities to partner outside the District
  - Revisit existing qualifying criteria required for incentives (e.g., revise existing qualifying criteria to expand incentives opportunities where feasible)

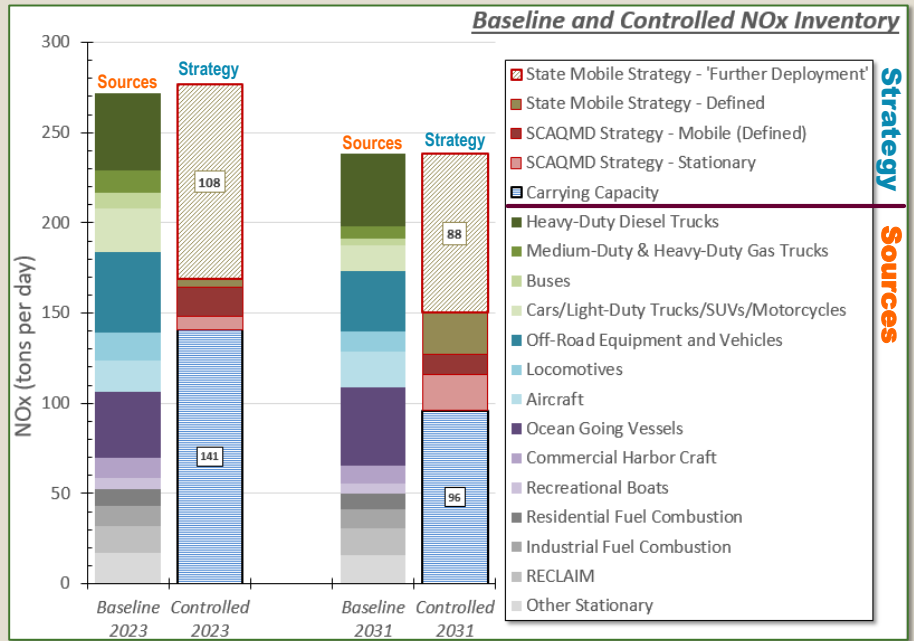
## Estimated Facility Sector Emissions by Source

- Estimates provide potential ‘universe’ of emissions that could be affected by a facility-based measure
- Estimates are not for SIP purposes
  - Estimates do not show emissions ‘caused’ by a facility sector
  - Some overlap between facility sectors (e.g., trucks)
- Detailed inventories will be calculated as SIP creditable measures are developed



# 2016 AQMP Baseline Emissions & Control Strategy

➤ Specific control strategy needs to be defined and in place three years before federal attainment deadline



# CARB Mobile Source Strategy

	Measure	Proposed Action Date in CARB Mobile Strategy	Proposed Implementation Date	Proposed Approach	SIP Reductions NOx (tpd)	
					2023	2031
On-Road Light Duty	Advanced Clean Cars 2	2020 - 2021	2026		0	0.6
	Lower In-Use Emission Performance Assessment	Ongoing			NYQ	NYQ
	Further Deployment of Cleaner Technologies	Ongoing			7	5
On-Road Heavy Duty	Lower In-Use Emission Performance Level	2017 - 2020	2018+	-Longer warranty periods (<0.1 tpd 2023, <0.9 tpd 2031) -Revised periodic smoke inspections, On Board Diagnostics, In-Use Compliance program, Durability/Useful Life -New HD Inspection & Maintenance	NYQ	NYQ
	Low-NOx Engine Standard – California Action	2019	2023		0	5
	Low-NOx Engine Standard – Federal Action	2019	2024		0	7
	Medium and Heavy-Duty GHG Phase 2	2017 - 2019	2018+		0	0
	Innovative Clean Transit	2017	2018		<0.1	0.1
	Last Mile Delivery/Advanced Clean Trucks	2018	2020	2020 - 2029 Phase in ZE purchases (25%-100%)	<0.1	0.4
	Innovative Technology Certification Flexibility	2016	2017	2023 - 2030 Phase in OEM Class 2B-7 ZE sales (2.5%-15%)	0	0
	ZE Airport Shuttle Buses	2018	2023	2023 - 2031 Phase in ZE shuttles (up to 100%)	NYQ	NYQ
	Incentive Funding	Ongoing			3	3
	Further Deployment of Cleaner Technologies	Ongoing			34	11
Ships, Locomotives, & Aircraft	More Stringent National Locomotive Emission Standards	2016	2023		<0.1	2
	Tier 4 Vessel Standards	2016 - 2018	2025		0	NYQ
	Incentivize Low Emission Efficient Ship Visits	2018 - 2020	2018+		NYQ	NYQ
	At-Berth Regulation Amendments	2018	2023	-Phase in controls starting 2022, with 100% by 2031	0.3	1
	Further Deployment of Cleaner Technologies	Ongoing			46	54
Off-Road	ZE Off-Road Forklift Regulation Phase 1	2020	2023		NYQ	NYQ
	ZE Off-Road Emission Reduction Assessment	2025+	--		NYQ	NYQ
	ZE Off-Road Worksite Emission Reduction Assessment	TBD	--		NYQ	NYQ
	ZE Airport Ground Support Equipment	2018	2023		<0.1	<0.1
	Small Off-Road Engines	2020	2022		0.7	2
	Transport Refrigeration Units	2018 - 2019	2020+	2023 - 2029 Phase in time limits for stationary operation 2025 - 2050 Phase in for ZE operation	NYQ	NYQ
	Low-Emission Diesel Requirement	2020	2023		0.3	1
	Further Deployment of Cleaner Technologies	Ongoing			21	18
Potential Additional Strategies	ZE Drayage Trucks	2022	2023 - 2028	Potential Additional Freight-Related Strategies	NYQ	NYQ
	Cargo Handling Equipment Amendments	2019	2022		NYQ	NYQ
	Harbor Craft Amendments	2021	2025		NYQ	NYQ
	Reduce stationary locomotive emissions (e.g., idling)	2020	2023		NYQ	NYQ
	Reduce emissions from non-pre-empted locomotives	2022	2025		NYQ	NYQ
	Freight Handbook	2019 - 2020	--		NYQ	NYQ
	Enhanced Freight Hub Enforcement	--	2018		NYQ	NYQ

## CARB SIP Strategy

- CARB SIP strategy includes mobile source measures and ‘Further Deployment Measures’
  - Further Deployment Measures rely on advanced cleaner technologies and further regulatory development as new technologies emerge
  - About 96% of state strategy for reducing an additional 108 tons per day of NOx by 2023 relies on ‘Further Deployment Measures’
- CARB Board directed its staff to return in March 2018 with *“concepts for an Indirect Source Rule to control pollution from large freight facilities including ports, railyards, warehouses and distribution centers, as well as any identified alternatives capable of achieving similar levels of emission reductions.”*

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## CARB Staff’s Proposed Strategy

- Interaction between state mobile source strategy and AB 617
  - AB 617 focuses regulatory efforts on reducing exposure in communities most impacted by air pollution
- CARB staff’s recent proposed approach\* focuses on reducing community impacts from large freight facilities
- Seven additional measures proposed
- Measures would also apply towards ‘Further Deployment’ commitment
  - The level of NOx reductions has not yet been determined



The table is titled 'CARB Mobile Source Strategy' and contains multiple columns and rows of data. The bottom portion of the table is highlighted in yellow, and a green arrow points from this area towards the text 'Potential Additional Strategies' below.

Potential Additional Strategies

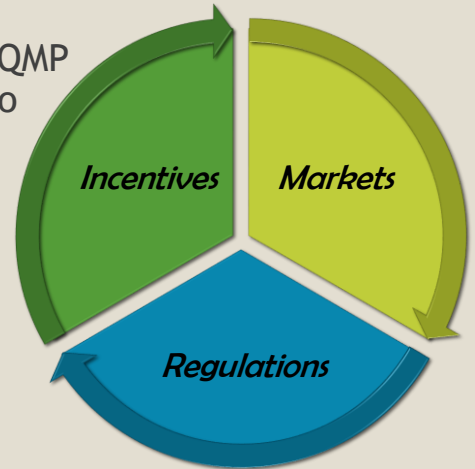
\* <https://www.arb.ca.gov/gmp/sfti/FreightFacility.htm>

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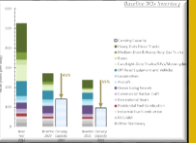




# Significant Emissions Reduction Need Require Comprehensive Approach

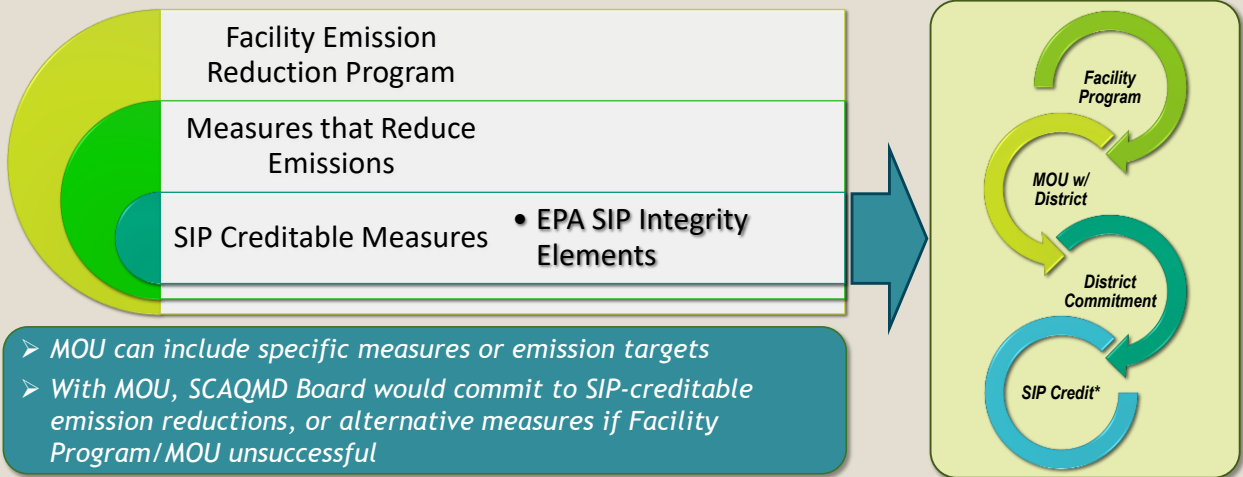
- Strategies explored since adoption of 2016 AQMP will reduce emissions but are not sufficient to meet air quality standards:
  - Proposed CARB & EPA measures
  - Currently identified incentive funding
  - Proposed voluntary facility-based measures
- All strategies need to be pursued, including new voluntary measures and available regulatory authority where needed



## Types of Emission Reduction Mechanisms

 <p><b><u>Incentives</u></b></p> <ul style="list-style-type: none"> <li>➤ Availability of technology</li> <li>➤ Funding commitment</li> <li>➤ Must demonstrate that incentivized activity meets 'integrity elements' to be SIP creditable</li> </ul>	 <p><b><u>Facilitating Measures</u></b></p> <ul style="list-style-type: none"> <li>➤ Infrastructure projects (e.g., EV charging, etc.)</li> <li>➤ Generally not SIP creditable but critical to facilitate emission reductions</li> </ul>	 <p><b><u>Inventory Adjustment</u></b></p> <ul style="list-style-type: none"> <li>➤ Requires demonstrated history of behavior (e.g., VMT reductions)</li> <li>➤ Records of behavior must be available to be SIP creditable</li> </ul>	 <p><b><u>MOU</u></b></p> <ul style="list-style-type: none"> <li>➤ Includes mutually agreeable emission reduction targets or measures</li> <li>➤ Procedure to make-up shortfalls required in case targets/measures not met in order to be SIP creditable</li> </ul>	 <p><b><u>Regulation</u></b></p> <ul style="list-style-type: none"> <li>➤ Must be feasible based on cost, availability of technology, etc.</li> <li>➤ Should avoid significant administrative or cost burdens</li> <li>➤ Should not hinder available incentives</li> </ul>
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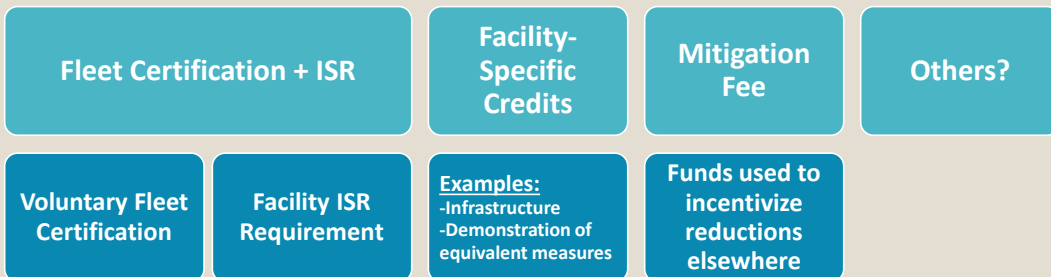
# Generalized MOU Approach



\*Subject to EPA Approval

# Generalized Regulatory Approach

## Multiple Compliance Options



# ISR Option Concept - Two Components

## Fleet Component

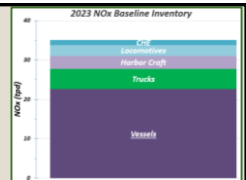
- Voluntary certification program
- Fleets could voluntarily certify that their activity in the air basin is XX% cleaner than state requirements
- Fleets that don't certify are assumed to only comply with state-wide requirements (e.g., 2010 trucks by 2023)
- Voluntary certification program would begin sometime between 2020-2023



## Project Component

- Indirect Source Rule
- Projects would be required to ensure that fleets serving their development are YY% cleaner than the state-wide requirements on average
- Projects must record on-site vehicles/equipment and the fleet they belong to
- Project average based on fleet certification levels
- Implementation would begin by 2023

# Summary of Recommended Ports Approach



### Potential Voluntary Measures

- Pursue individual MOUs on specific CAAP measures
  - Clean Truck Program
  - CHE Procurement Planning
- Pursue introduction of cleaner vessels
  - Demonstrations, incentives, etc.

### Key Factors in Evaluating Voluntary Approach

- Significant public process already conducted to develop CAAP Update
- CAAP Update needs opportunity to succeed
  - Substantial implementation of Clean Truck Program and CHE Procurement Planning by 2019
- History of emission reductions at ports

### Potential Regulatory Measures

- Do not pursue ISR now
- In 2019-2020, evaluate potential need for ISR
- If MOUs not successful, potentially pursue ISR applicable to terminal operators

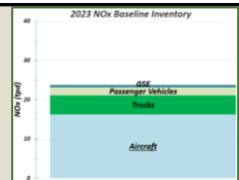
Continue to Pursue

Re-evaluate in 2019-2020

# Board Direction for Airports

- Board amendment to adoption of 2016 AQMP
  - “Undertake a stakeholder process and draft for our consideration an indirect source rule for commercial airports within the South Coast Basin by February 1, 2019 to control emissions of NOx, PM2.5, lead and diesel particulate matter from non-aircraft sources”
  - Board discussion on the amendment included allowing an opportunity for airports to develop their own Clean Air Action Plans

# Summary of Recommended Airports Approach



## Potential Voluntary Measures

- Pursue individual MOUs with each airport
  - Airport-specific Clean Air Action Plans (AirCAAP)
- AirCAAP to incorporate airports' existing measures and new measures
- Include explicit process for pursuing FAA VALE/ZEV funding

## Key Factors in Evaluating Voluntary Approach

- Many emission reduction programs already in place at airports
- Opportunity for significant emission reductions from airports beyond existing programs limited
  - -8 tpd NOx outside of aircraft in 2023
  - CARB ZE GSE & shuttle bus rules underway

## Potential Regulatory Measures

- Do not pursue ISR now
- If not all airports agree to develop an AirCAAP and MOU, staff could develop ISR rule requiring AirCAAP
  - Staff would report back to MS cmte. by summer 2018

Continue to Pursue

Re-evaluate in 2018-2019

# Key Comments from Airports Working Group on Potential MOU Approach

- Industry prefers measure-based instead of emissions target-based approach in an MOU
- General conformity can limit airports' ability to implement new emission reduction strategies
- Aircraft should be kept out of any MOU due to concerns about pilot discretion, and federal requirements

# Summary of Recommended Warehouses Approach



## Potential Voluntary Measures

- Develop new CEQA Air Quality Mitigation Fund for projects to contribute to, for regional NOx mitigation
- Work with CARB on Freight Handbook (focus on warehouses first)
- Explore Green Delivery options (e.g., consumer opt-in fee to fund cleaner delivery fleets)

## Key Factors in Evaluating Voluntary Approach

- Limited emission reductions from proposed measures
- Large number of warehouses in basin precludes broad plan-based approach
- Current and upcoming availability of ZE/NZE trucks

## Potential Regulatory Measures

- Voluntary Fleet Certification + ISR for delivery trucks
- Potential crediting options:
  - Infrastructure - TRU charging, fleet fueling, solar/battery, etc.
  - Onsite ZE equipment - hostlers, forklifts, etc.
  - Mitigation fee
  - Others?

Continue to Pursue

Continue to Pursue

# Key Considerations for Warehouses

- Depending on scope, regulation may broadly affect goods movement industry
- State Sustainable Freight Action Plan includes three core components:
  - 1) Increased Efficiency, 2) Increased Competitiveness, 3) Transition to ZE/NZE Technology
  - Many efforts underway with SCAQMD/CARB/DOT/CEC/industry to implement all components of state plan
    - FBMSM effort focuses most on third core component, but proposed approach attempts to limit impact on first two components
- Varying warehouse and trucking business models may complicate regulatory approach
  - Needs further study

# Summary of Recommended New/Redevelopment Approach



## Potential Voluntary Measures

- Develop new CEQA Air Quality Mitigation Fund for projects to contribute to, for regional NOx mitigation
- Update SCAQMD CEQA handbook to include guidance for:
  - Net-zero developments
  - Charging infrastructure
  - ZE lawn & garden equipment
  - Clean Construction Policies
- Continue to work with CEC/PUC/utilities to expand charging infrastructure

## Key Factors in Evaluating Voluntary Approach

- Proposed voluntary measures would not substantially reduce NOx emissions (e.g., co-benefits of Climate Action Plans)
- Large number of development projects in basin precludes broad plan-based approach
- Other air district ISR programs and state 'all feasible measures' requirement

## Potential Regulatory Measures

- Voluntary Fleet Certification + ISR for construction equipment/ fleets
- Could include 'bubble' for all equipment (e.g., trucks + constr. equip. + portable equip.)
- Potential crediting options:
  - Mitigation fee
  - Demonstration of equivalent emission reductions
  - Installation of fueling/charging infrastructure
  - Others?

Continue to Pursue

Continue to Pursue

# Key Considerations for New/Redevelopment Projects

- Off-road construction emissions inventory will continue to need refining
- Regulation could reduce some litigation risk for air quality impacts under CEQA
- Focus would be on larger construction projects
  - Administrative burden of 1000's of smaller projects
  - Large earth-moving/grading projects are typically largest source of NOx emissions

# Summary of Recommended Rail Yards Approach



## Potential Voluntary Measures

- Staff open to new agreements/MOUs beyond existing 1998 & 2005 agreements
- Inventory adjustments possible with facility reconfigurations, fuel efficiency improvements, etc.

Continue to Pursue

## Key Factors in Evaluating Voluntary Approach

- Each rail yard has unique operating characteristics
- No new voluntary measures proposed by stakeholders that would substantially reduce NOx emissions
- Rail Yards have historically contributed to poor air quality in surrounding communities

## Potential Regulatory Measures

- ISR requiring Rail Yard-specific Clean Air Action Plans
- Potential measures in RailCAAPs could include:
  - Voluntary Fleet Certification program (also used by warehouses)
  - Preferentially route cleaner locomotives
  - Potential crediting options:
    - Infrastructure - hood technology, exposure reducing measures, etc.
    - Onsite ZE equipment - yard trucks, etc.
    - Cleanest switchers and/or CHE available
    - Etc.
- Potential for targets at the facility or railroad level

Continue to Pursue

# Key Regulatory Considerations for Rail Yards

- Locomotives are primary source of emissions
  - SIP inventory already assumes ~40-50% Tier 4 line-haul locomotives in 2023
    - Only ~3% Tier 4 line-haul locomotives used in 2016
    - No Tier 4 locomotives currently included in 2023 inventory for Metrolink
    - Depending on technologies used, trucks may have lower NOx emissions than locomotives (and higher for other pollutants like GHGs)
- Depending on structure of rule, harmonization with Interstate Commerce Commission Termination Act likely required
- Potential synergy with AB 617
- Potential CARB locomotive strategies complement recommended FBMSM approach

The image shows a screenshot of a table titled 'CARB Mobile Source Strategy'. The table has multiple columns and rows, with a yellow highlight on the bottom portion of the table. The text 'CARB Mobile Source Strategy' is written vertically on the left side of the table.

← Potential CARB Strategies

# Summary of Staff Recommendation for FBMSM

FBMSM Facility Sector	Pursue <u>Voluntary</u> Measures Now?	Also Pursue <u>Regulatory</u> Measures Now?
<b>Ports</b>	<b>Yes</b>	<b>No</b>
<b>Airports</b>	<b>Yes</b>	<b>No</b>
<b>Warehouses</b>	<b>Yes</b>	<b>Yes</b>
<b>New / Redevelopment</b>	<b>Yes</b>	<b>Yes</b>
<b>Rail Yards</b>	<b>Yes</b>	<b>Yes</b>



# Potential FBMSM Development Timing

Proposed Measures	2018				2019				2020			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Develop MOUs with Ports on Clean Truck Program and CHE												
Develop Vessel Incentive Programs and Demonstration Projects												
Airports Develop AirCAAPs												
Develop MOUs with Airports												
Develop Voluntary Fleet Certification Program												
Develop Warehouse ISR												
Develop CEQA Air Quality Mitigation Fund + Green Delivery Options												
Work w/CARB on Freight Handbook												
Update SCAQMD CEQA Handbook for New Development												
Develop New/Redevelopment ISR												
Develop Rail Yard ISR												
Staff update to Mobile Source Committee												

Measure Development
  Proposed Measure Brought to Decision-Making Body for Consideration
  Update Board

## Next Steps

- Receive and incorporate feedback from committee and public
- Present staff recommendation to Governing Board in March

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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## Draft Staff Update and Recommendations Facility Based Mobile Source Measures

**February 2018**

**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 Rees, Ph.D.

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

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Speaker of the Assembly Appointee

Vice Chairman: DR. CLARK E. PARKER, SR.  
Senate Rules Committee Appointee

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County of Riverside

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City of Los Angeles Representative

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Governor's Appointee

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Cities of San Bernardino County

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County of Los Angeles

**EXECUTIVE OFFICER:**

WAYNE NASTRI

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## **TABLES AND FIGURES**

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**Table 3-1: Summary of FBMSM Voluntary and Regulatory Emission Reduction Strategies**

**Figure 1-1: NO<sub>x</sub> Emission Reductions Needed to Achieve Federal 8-Hour Ozone NAAQS**

**Figure 1-2: NO<sub>x</sub> Control Strategy in 2016 AQMP**

**Figure 2-1: FBMSM Development Framework**

**Figure 2-2: 2023 NO<sub>x</sub> Baseline Inventory Estimate by Facility Sector**

**Figure 2-3: U.S. EPA SIP Integrity Elements**

**Figure 2-4: Potential MOU Pathway**

**Figure 3-1: ISR Option Concept – Coupled Voluntary Fleet Certification**

**Figure 3-2: Port-Related Mobile Source NO<sub>x</sub> Emissions (tons per day)**

**Figure 3-3: Landing Take-Off (LTO) Activity by Aircraft Type**

**Figure 3-4: Potential Schedule to Implement the Proposed FBMSM Strategies**

## **CHAPTER 1: INTRODUCTION**

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**BACKGROUND**

**RECENT STAFF ACTIVITIES**

**LOCAL AND REGIONAL ACTIVITIES**

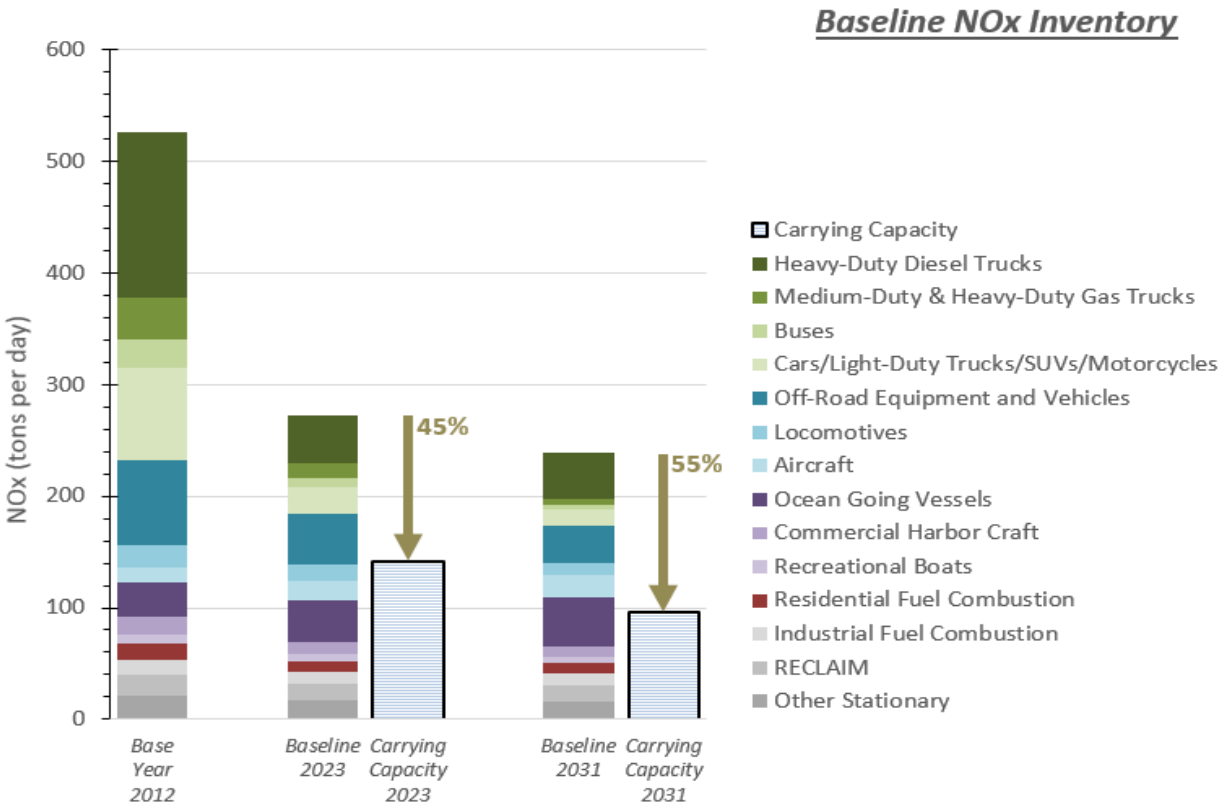
**CALIFORNIA AIR RESOURCES BOARD ACTIVITIES**

## BACKGROUND

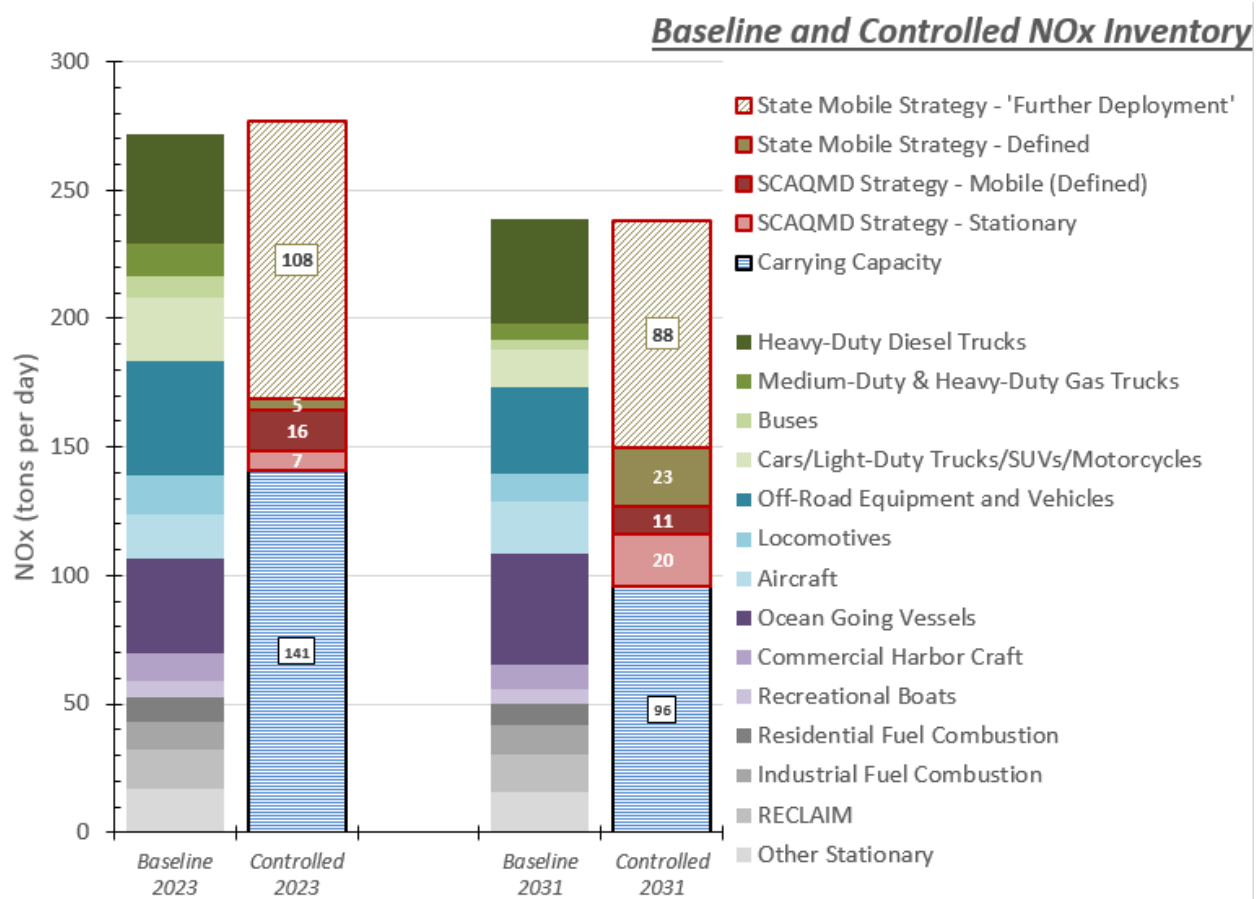
The Final 2016 Air Quality Management Plan (AQMP) was adopted by the South Coast Air Quality Management District (SCAQMD) Board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving federal and state air quality standards and healthful air in the South Coast Air Basin (Basin). The Basin still exceeds federal and state public health standards for both ozone and particulate matter (PM) and experiences some of the worst air pollution in the nation. In particular, the Basin is designated as an extreme non-attainment area for the 1-hour and 8-hour federal ozone National Ambient Air Quality Standards (NAAQS), serious non-attainment for the 24-hour PM<sub>2.5</sub> NAAQS, and non-attainment for the state AAQS for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>.

The key strategy to meet this air quality challenge is to reduce nitrogen oxide (NO<sub>x</sub>) emissions sufficiently to meet the 8-hour ozone NAAQS deadlines (80 ppb in 2023 and 75 ppb in 2031). If these standards are met then all other federal ozone and PM standards should be achieved. Based on analysis in the 2016 AQMP, in order to meet the ozone NAAQS deadline, the total Basin emissions of NO<sub>x</sub> must be reduced to approximately 141 tons per day in 2023 and 96 tons per day in 2031 to attain the 8-hour ozone standards. This represents an additional 45% reduction in NO<sub>x</sub> beyond baseline 2023 levels, and an additional 55% NO<sub>x</sub> reduction beyond baseline 2031 levels. As seen in Figure 1-1, approximately 80% of NO<sub>x</sub> emissions in 2023 and 2031 will be from mobile sources.

**Figure 1-1: NO<sub>x</sub> Emission Reductions Needed to Achieve Federal 8-Hour Ozone NAAQS**



**Figure 1-2: NOx Control Strategy in the 2016 AQMP**



The control strategy in the 2016 AQMP includes many stationary and mobile source measures that will be carried out by the District and the California Air Resources Board (CARB) (Figure 1-2). In particular, CARB is committed to achieving emission reductions with its state Mobile Source Strategy in the State Implementation Plan (SIP). The majority of these emission reductions come from measures titled as “Further Deployment of Cleaner Technologies” (Further Deployment Measures). The Further Deployment Measures are expected to reduce 108 tons per day of NOx emissions beyond 2023 baseline by 2023 and 88 tons per day beyond 2031 baseline by 2031. Implementation of the Further Deployment Measures is based on a combination of incentive funding, development of regulations, and quantification of emission reduction benefits from increased operational efficiencies, such as deployment of autonomous and/or connected vehicles, operational improvements, etc. The 2016 AQMP may need to rely on flexibility provided in section 182(e)(5) of the federal Clean Air Act to demonstrate that the plan will attain air quality standards because these Further Deployment Measures are not yet defined or implemented. However, this same section requires the state to submit “enforceable commitments to develop and adopt contingency measures... no later than 3 years before proposed implementation of the plan provisions”. For instance in the case of the 2023 attainment date for the 8-hour ozone standard, any 182 (e)(5) flexibility relied on for Further Deployment Measures must be replaced with contingency measures in 2020.



In the 2016 AQMP, the SCAQMD committed to assist CARB and U.S. EPA in developing the Further Deployment Measures, including through development of local Facility Based Mobile Source Measures (FBMSMs). Five FBMSMs were included in the Final 2016 AQMP as part of the mobile source strategy to help attain the 8-Hour Ozone NAAQS. The FBMSMs address indirect sources including new development and redevelopment projects (EGM-01), commercial marine ports (MOB-01), railyards and intermodal facilities (MOB-02), warehouse distribution centers (MOB-03) and commercial airports (MOB-04). Recognizing the importance of reducing emissions from facilities that attract mobile emissions sources, federal law allows states to adopt indirect source regulations. California law explicitly provides Indirect Source Rule (ISR) authority to local air districts [Health & Safety Code § 40716 (a)(1)]. An indirect source is defined under the federal Clean Air Act as any facility, building, structure, or installation, or combination thereof, which generates or attracts mobile source activity that results in emissions of any pollutant (or precursor) for which there is an air quality standard. See 42 U.S.C. § 7410(a)(5)(C).

## **STAFF ACTIVITIES**

The 2016 AQMP described a year-long process for staff to evaluate potential emissions reduction strategies for the FBMSMs and report back to the Board on the most promising approaches. Following this process, SCAQMD staff convened five FBMSM Working Groups, each focused on one facility sector (e.g., warehouses, airports, etc.), that have primarily focused on potential voluntary approaches to achieve emission reductions to help implement the Further Deployment Measures. Over the past year, SCAQMD staff have conducted 17 Working Group Meetings, and many additional individual stakeholder meetings and site visits. Some of the key topics discussed during the Working Group meetings included: 1) a framework for developing FBMSMs, 2) potential methods for obtaining SIP credit for voluntary measures, and 3) potential voluntary and regulatory emission reduction strategies for each facility sector. To assist in identifying potential areas of opportunity for emission reductions, SCAQMD staff developed emission inventories for each facility sector that provided a rough estimate of the NO<sub>x</sub> baseline emissions in 2023 that could be affected by FBMSMs.

Consistent with the 2016 AQMP, SCAQMD staff provided progress reports to the SCAQMD Mobile Source Committee in May and October of 2017, and is planning to return to the Governing Board in March 2018 to present recommendations on specific FBMSM approaches. This staff update provides a discussion by facility sector and the specific FBMSM approaches recommended by staff.

## **LOCAL AND REGIONAL ACTIVITIES**

A number of local and regional jurisdictions have pursued policies that could benefit air quality. Two examples of these policies include the Ports Clean Air Action Plan Update and the LAX Alternative Fuel Policy Update discussed below.

### **Ports' Clean Air Action Plan Update**

On November 2, 2017 the governing boards of the Port of Los Angeles and Port of Long Beach (Ports) approved the 2017 CAAP Update that provides high-level guidance for reducing emissions from the Port facilities. Key CAAP strategies include:

- An update to the Clean Truck Program that will include initiating a new differential rate structure to encourage the introduction of Near Zero Emissions (NZE) and Zero Emissions

(ZE) trucks into the drayage fleet. The rate structure would begin in 2020 and exempt NZE/ZE trucks. Starting in 2023, or whenever CARB implements its new NZE truck engine standard, new trucks entering the Ports' drayage registry must be NZE or ZE. Starting in 2035, only ZE trucks would be exempt from the rate structure.

- Developing a universal truck reservation system, staging yards, intelligent transportation systems and other efficiency programs to reduce emissions while improving the flow of cargo;
- Beginning in 2019, requiring terminal operators to develop Cargo Handling Equipment (CHE) procurement plans and to deploy zero-emission equipment, if feasible, or the cleanest available when procuring new CHE, with the goal of transitioning all terminal equipment to zero emissions by 2030;
- Providing new incentives to cleaner ships, such as by updating the existing Vessel Speed Reduction (VSR) Program to increase its effectiveness, and implementing a variable rate to promote cleaner ships by 2025;
- Developing infrastructure plans to support terminal equipment electrification, alternative fuels and other energy resource goals; and
- Expanding the use of on-dock rail, with the long-term goal of moving 50% of all cargo leaving the Ports by rail.

The 2017 CAAP Update established new emission reduction targets for reducing greenhouse gases (GHGs) from Port-related sources – 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. The 2017 CAAP Update maintains the emission reduction goals of the 2010 CAAP. These goals include reducing diesel particulate matter (DPM) by 77%, sulfur oxides (SOx) by 93%, and NOx by 59% below 2005 levels by the year 2023.

SCAQMD staff has worked extensively with Port staff in the development and early implementation of the 2017 CAAP Update. The recommended strategy in Chapter Three of this staff update aims to build off of this collaborative work to implement, supplement, and accelerate the measures in the CAAP.

#### **LAX Alternative Fuel Policy Update**

In October 2017 LAX approved an update to its Alternative Fuel Policy that applies to vehicles greater than 8,500 pounds gross vehicle weight rating (e.g., buses, trucks, passenger vans, etc.) that are used in operations related to LAX. The previous policy from 2007 had been approved as part of a Community Benefits Agreement, however recent compliance with this policy was less than 50%. Throughout the year, SCAQMD staff worked collaboratively with LAX staff to modernize the policy to reflect current vehicle technologies, to bring the applicable vehicles covered by the policy into compliance as quickly as feasible, and to encourage the introduction of zero emission vehicles. The recommended strategy in Chapter Three of this staff update aims to build off of this collaborative work to incorporate this policy, and others, into a comprehensive plan for LAX.

## **CALIFORNIA AIR RESOURCES BOARD ACTIVITIES**

Throughout the FBMSM Working Group Process, the SCAQMD staff has coordinated extensively with CARB staff as they develop their regulatory program to implement the SIP. The state strategy approved by CARB as part of the SIP approval includes several specific mobile source measures (Table 1-1) in addition to the previously described ‘Further Deployment Measures’. Over the past year and a half, CARB has continued to advance these measures, including adopting two measures, and initiating public workshops with proposed draft approaches for six other measures. While each of these measures will unquestionably have air quality benefits, including reducing emissions of pollutants other than NO<sub>x</sub>, cumulatively these eight measures are projected to reduce less than 1 ton per day of NO<sub>x</sub> by 2023. In total, about 96% of CARB’s strategy for reducing an additional 108 tons per day of NO<sub>x</sub> by 2023 relies on ‘Further Deployment Measures’.

In addition to these specific strategies, as part of its approval of the SIP in March 2017, the CARB Board directed its staff to return in one year with an update on the implementation of the SIP, as well as *“concepts for an Indirect Source Rule to control pollution from large freight facilities including ports, railyards, warehouses and distribution centers, as well as any identified alternatives capable of achieving similar levels of emission reductions.”*

Subsequent to the approval of the 2016 AQMP and the SIP by CARB, the state legislature passed AB 617<sup>1</sup> which is designed to focus air quality regulatory efforts towards reducing exposure in communities most impacted by air pollution. Consistent with the intent of AB 617 and its Board direction on ISR, CARB staff held workshops throughout the state to discuss the air quality impacts on communities from large freight facilities and how to address them. Recently released materials for upcoming workshops<sup>2</sup> provide CARB staff’s proposed approach to address impacts from large freight facilities (see ‘Potential Additional Strategies’ in Table 1-1). The proposed approach includes focusing on measures that would reduce community impacts of large freight facilities, consistent with the requirements of AB 617. Each of these measures would also apply towards CARB’s ‘Further Deployment’ commitment; however the potential level of NO<sub>x</sub> reductions has not yet been determined.

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<sup>1</sup> Available here: [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180AB617](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617)

<sup>2</sup> Available here: <https://www.arb.ca.gov/gmp/sfti/FreightFacility.htm>

Table 1-1: CARB Mobile Source Emission Reduction Activities

	Measure	Proposed Action Date in CARB Mobile Strategy	Proposed Implementation Date	Proposed Approach	SIP Reductions NOx (tpd)	
					2023	2031
On-Road Light Duty	Advanced Clean Cars 2	2020 - 2021	2026		0	0.6
	Lower In-Use Emission Performance Assessment	Ongoing			NYQ	NYQ
	<b>Further Deployment of Cleaner Technologies</b>	<b>Ongoing</b>			<b>7</b>	<b>5</b>
On-Road Heavy Duty	Lower In-Use Emission Performance Level	2017 - 2020	2018+	-Longer warranty periods (<0.1 tpd 2023, <0.9 tpd 2031) -Revised periodic smoke inspections, On Board Diagnostics requirements, In-Use Compliance program, Durability/Useful Life requirements -New HD Inspection & Maintenance	NYQ	NYQ
	Low-NOx Engine Standard – California Action	2019	2023		0	5
	Low-NOx Engine Standard – Federal Action	2019	2024		0	7
	Medium and Heavy-Duty GHG Phase 2	2017 - 2019	2018+		0	0
	Innovative Clean Transit	2017	2018	2020 - 100% NZE (purchase - all fleets) 2020 - 2029 Phase in ZE purchases (25%-100%)	<0.1	0.1
	Last Mile Delivery/Advanced Clean Trucks	2018	2020	2023 - 2030 Phase in OEM Class 2B-7 ZE sales (2.5%-15%)	<0.1	0.4
	Innovative Technology Certification Flexibility	2016	2017	Provides certification flexibility to OEMs for cleaner engines	0	0
	ZE Airport Shuttle Buses	2018	2023	2023 - 2031 Phase in ZE shuttles (up to 100%)	NYQ	NYQ
	Incentive Funding	Ongoing			3	3
<b>Further Deployment of Cleaner Technologies</b>	<b>Ongoing</b>			<b>34</b>	<b>11</b>	
Ships, Locomotives, & Aircraft	More Stringent National Locomotive Emission Standards	2016	2023		<0.1	2
	Tier 4 Vessel Standards	2016 - 2018	2025		0	NYQ
	Incentivize Low Emission Efficient Ship Visits	2018 - 2020	2018+		NYQ	NYQ
	At-Berth Regulation Amendments	2018	2023	-Phase in controls starting 2022, with 100% by 2031	0.3	1
	<b>Further Deployment of Cleaner Technologies</b>	<b>Ongoing</b>			<b>46</b>	<b>54</b>
Off-Road	ZE Off-Road Forklift Regulation Phase 1	2020	2023		NYQ	NYQ
	ZE Off-Road Emission Reduction Assessment	2025+	--		NYQ	NYQ
	ZE Off-Road Worksite Emission Reduction Assessment	TBD	--		NYQ	NYQ
	ZE Airport Ground Support Equipment	2018	2023		<0.1	<0.1
	Small Off-Road Engines	2020	2022		0.7	2
	Transport Refrigeration Units	2018 - 2019	2020+	2023 - 2029 Phase in time limits for stationary operation 2025 - 2050 Phase in for ZE operation	NYQ	NYQ
	Low-Emission Diesel Requirement	2020	2023		0.3	1
	<b>Further Deployment of Cleaner Technologies</b>	<b>Ongoing</b>			<b>21</b>	<b>18</b>
Potential Additional Strategies	ZE Drayage Trucks	2022	2023 - 2028	Potential additional freight-related strategies	NYQ	NYQ
	Cargo Handling Equipment Amendments	2019	2022		NYQ	NYQ
	Harbor Craft Amendments	2021	2025		NYQ	NYQ
	Reduce stationary locomotive emissions (e.g., idling)	2020	2023		NYQ	NYQ
	Reduce emissions from non-pre-empted locomotives	2022	2025		NYQ	NYQ
	Freight Handbook	2019 - 2020	--		NYQ	NYQ
	Enhanced Freight Hub Enforcement	--	2018		NYQ	NYQ
	<i>Public workshops underway</i>			Percentage of committed NOx emission reductions from Further Deployment Measures	96%	79%
	<i>Measure adopted</i>					

## **CHAPTER 2: WORKING GROUP PROCESS**

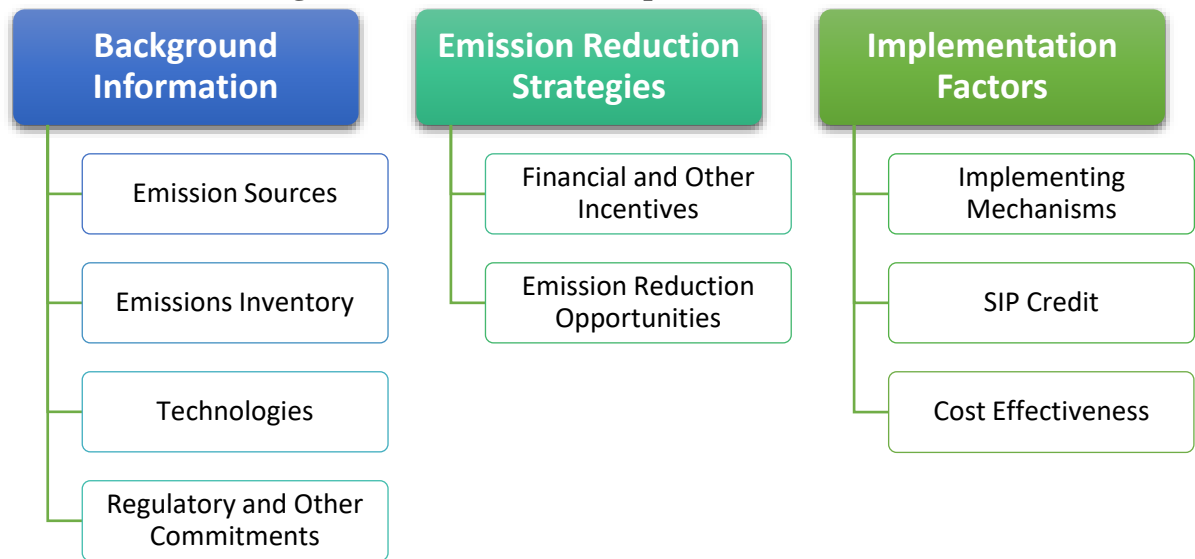
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### **FBMSM FRAMEWORK**

## FBMSM DEVELOPMENT FRAMEWORK

Through the FBMSM Working Group process SCAQMD staff collaborated with stakeholders to establish a development framework (Figure 2-1) intended to ultimately identify strategies that could reduce emissions from sources associated with FBMSMs. The development framework was comprised of three major categories including Background Information, Implementation Factors, and Emissions Reduction Strategies. The information gathered for each of these categories through the FBMSM Working Group process was used to inform SCAQMD staff's proposed emission reduction strategies for the FBMSMs presented in Chapter Three of this staff update.

**Figure 2-1: FBMSM Development Framework**



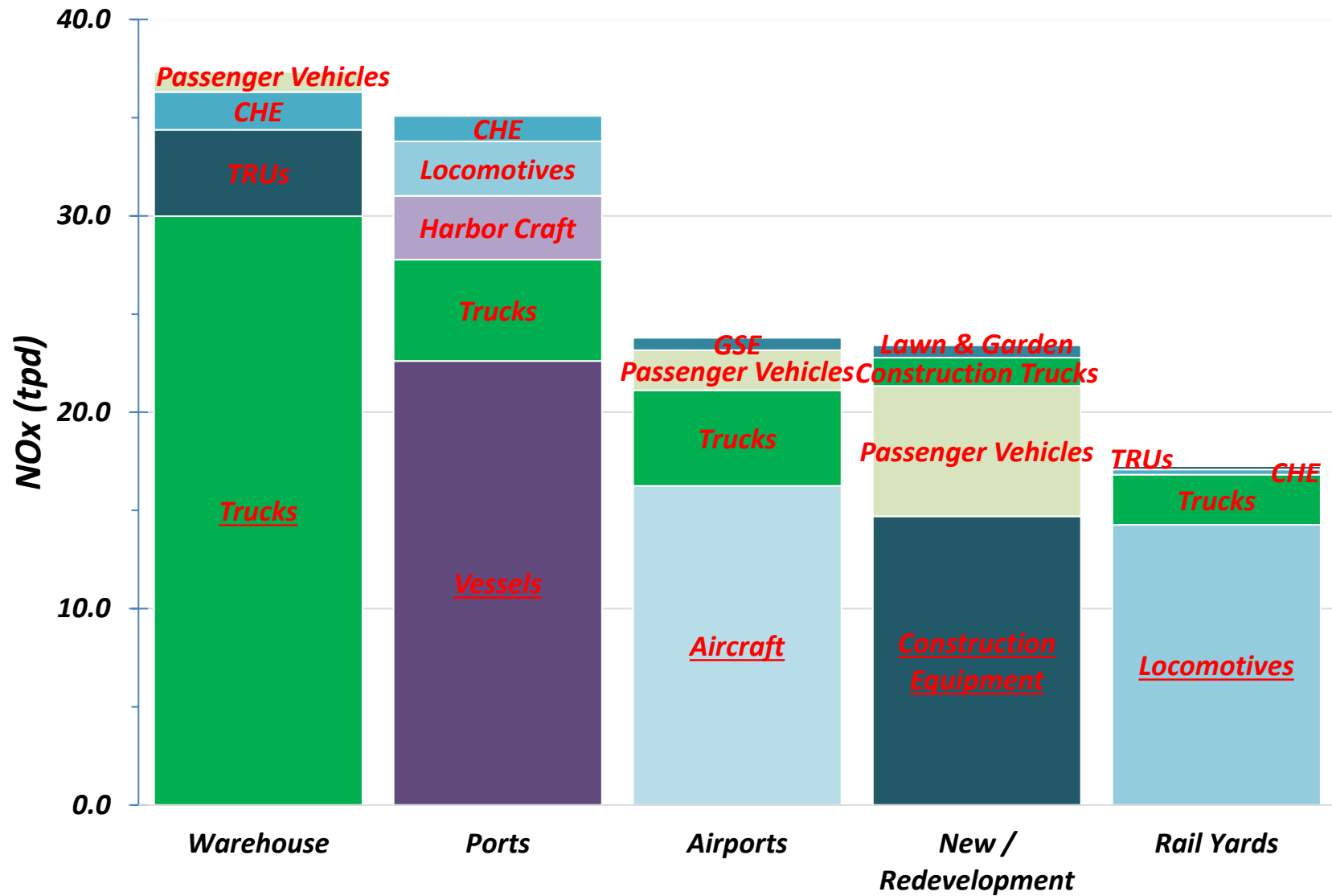
### **Background Information**

#### **Emission Sources and Emissions Inventory**

SCAQMD staff provided an estimate of the baseline NO<sub>x</sub> emissions in 2023 that could be affected by each FBMSM (Figure 2-2). The estimated baseline NO<sub>x</sub> emissions are not intended to be final values used for the SIP or for regulatory purposes. Instead, they are intended as a point of reference to guide future strategies, policies and/or rules aimed at reducing emissions from sectors affected by FBMSM. More detailed emissions inventories will be developed in future public processes to address any specific measure that will be used to obtain SIP credit (such as a regulation, MOU, etc.) and for future AQMPs.

Three key relationships are found from these estimates. First, for each facility sector a single vehicle type dominates the emissions profile. Second, emissions can overlap between facility sectors. For example, the same trucks that visit the Ports can visit warehouses and rail yards, and the inventories are not designed to be mutually exclusive. Third, while these inventories are rough estimates, they reflect the reality that these facility sectors make up a substantial fraction of the Basin's NO<sub>x</sub> emissions, and significant emission reductions must be found for each sector if our region is to meet air quality standards. Strategies developed in Chapter Three take into account these relationships.

## 2023 NOx Baseline Inventory



### Technologies

New technologies were regularly discussed at FBMSM Working Group Meetings convened over the last year. For example, an 11.9 liter natural gas engine was recently certified to meet or exceed CARB's lowest optional low NOx standard, which is at least 90% cleaner than trucks meeting EPA's 2010 standard. Further, with the rapid decline in Li-ion battery prices, several new initiatives have been announced by commercial truck manufacturers in the past year for commercialization of zero emission trucks (battery, plug-in hybrid, hydrogen) of a variety of sizes. The business case for fleet owners to introduce zero-emission trucks into their operations has become more favorable than in previous years because of the rapid decrease in costs for some of these technologies. However cost remains an important factor, and widespread adoption is not expected by 2023 without additional developments (e.g., incentives, market development of advanced cleaner technologies, regulations). Similar scenarios can be described for commercially available technologies for other vehicle types, such as tier 3 vessels, tier 4 final off-road equipment, cleaner harbor craft, etc.

While many commercially available technologies exist that provide substantial NOx reductions, some vehicle types would benefit from additional technology demonstrations, including ZE cargo handling equipment, retrofitted vessels that would be cleaner than tier 2, further development of ZE trucks, etc. Strategies outlined in Chapter Three take into account the incentives needed to bring existing technologies into market, as well as the areas where new technology development is needed.

### Regulatory and Other Commitments

In order to provide a single reference for the many regulations that currently exist to reduce emissions from mobile sources, staff compiled a website<sup>1</sup> of all of the key federal and state regulations that target mobile source criteria pollutant emissions. Additional discussion of upcoming CARB regulations is included in Chapter One of this staff update.

While the focus of FBMSMs is local and state actions, many mobile sources are regulated at the federal level. To this end, staff submitted a petition to US EPA to update its truck engine regulations to include a new lower NOx standard, and CARB petitioned US EPA to update its locomotive engine standard to include a new Tier 5 standard, and new repowering requirements. US EPA has committed to revisiting the truck standards, but has not yet taken action on either petition. US EPA also recently proposed an action allowing truck glider kits to use older engines that do not meet current standards. Such an action, if finalized, could increase NOx in the Basin. In the past year, SCAQMD and CARB staff have written comment letters opposing this rollback in regulation.

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<sup>1</sup><http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/regs-commitments>



## **Implementation**

### **SIP Credit**

One of the primary objectives of the FBMSM Working Group meetings was to develop a list of potential emissions reduction strategies for each facility sector in addition to the strategies that CARB is currently pursuing under ‘Further Deployment Measures’ of the state mobile source strategy. To achieve this goal, staff worked closely with stakeholders through the FBMSM Working Group process to establish collaborative, voluntarily approaches. One consideration for evaluating proposed voluntary measures is whether subsequent emission reductions could be used towards obtaining prospective (i.e. future) SIP credit against control measure commitments. Any emission reductions resulting from voluntary measures used to demonstrate attainment must be submitted to US EPA for approval before SIP credit is given. Similarly, emission reductions can be demonstrated through Rate-of-Progress evaluations, and ultimately could count for SIP creditable reductions. US EPA evaluates the following criteria when considering whether to approve voluntary measures for potential prospective SIP credit (see the References at the end for a list of relevant guidance documents):

1. Demonstration that US EPA “integrity elements” have been satisfied (Figure 2-3).
2. SCAQMD commitment to monitor, assess, and regularly report to US EPA on emission reductions achieved.
3. Development of provisions to ensure US EPA and the public have access to emissions data and for evaluating procedures to determine the overall effectiveness of the program.
4. Demonstration that adequate funding, personnel, and implementation authority are available for the proposed measure.
5. SCAQMD commitment to remedy any emission reduction shortfall.

### Figure 2-3 US EPA SIP Integrity Elements

**Permanent:** Emissions reductions must continue through the term that the credit is granted (e.g., the attainment date).

**Enforceable:** Several criteria must be met to demonstrate enforceability:

- Emissions reductions occurring under the program must be independently verifiable for each source.
- The program should define compliance options and violations.
- The public must have access to emissions-related information and the ability to file a lawsuit against responsible entities if violations occur.
- EPA should have the ability to apply penalties and secure corrective actions.

**Quantifiable:** The emissions reductions should be calculated by a reliable and replicable methodology and all analyses must be substantiated and documented.

**Surplus:** Emissions reductions are surplus if they are not required or assumed in another SIP program or any other adopted state air quality program or federal rule.

### *Implementing Mechanisms*

The potential mechanisms that are available to reduce future emissions can be grouped into five broad categories, including incentives, facilitating measures, inventory adjustments, Memoranda of Understanding (MOUs) or other agreements, and regulations.

- *Incentives:* Incentive programs promote projects that implement cleaner/advanced technologies. Familiar programs include the Carl Moyer or Prop 1B funding programs to offset the increased cost of purchasing cleaner technology. Additional non-monetary incentives are also potentially available, such as preferential access to a facility for cleaner vehicles (e.g., HOV stickers for ZE cars). Incentive programs are potentially SIP creditable if they meet the criteria outlined above, including US EPA’s “integrity elements”.
- *Facilitating Measures:* Deployment of newer vehicle technologies typically require the installation of fueling/charging transportation infrastructure. These infrastructure projects are critical to ensuring the viability and penetration of cleaner technologies, however they are typically not SIP creditable on their own.
- *Inventory adjustments:* As a normal part of air quality management planning, emission inventories are regularly reviewed and updated to incorporate new information as it becomes available. For example, if a demonstrated history of activity is shown, adjustments to future emission inventories can be made. An example is the Ports’ Vessel Speed Reduction (VSR) Program, where records show that the program achieves 80-90% compliance, resulting in significant emission reductions. The demonstrated history of activity, and the continuation of the program, future emission inventories reflect the lower emissions expected from vessels. Additional adjustments for other activities could also potentially be made as part of Reasonable Further Progress demonstrations.
- *Agreements or MOUs:* Formal agreements or MOUs can be established between CARB or SCAQMD and a facility (e.g., Port, airport, terminal operator, etc.) or business(es) (e.g., railroads) to partner in implementing emissions reduction measures (Figure 2-4). An example includes the 1998 railroad agreement between CARB and UP and BNSF that requires the railroads to operate a locomotive fleet in the South Coast Air Basin that meets the Tier 2 locomotive standard on average<sup>1</sup>. An MOU is a mutually binding agreement and requires both parties to agree on terms and conditions, and individually crafted actions that achieve emissions reductions by certain dates. An MOU would be structured to meet SIP integrity elements. The commitments made in an MOU would be enforceable by US EPA against the District. Just as the District would have to make up any shortfall from a traditional regulatory measure, so too the District would have to make up any shortfall from an MOU. The enforceability described in Figure 2-3 against the District would be much the same as existing enforceability for other control measures or rules adopted by the District.
- *Regulations:* SIP creditable emission reductions have most commonly been achieved through the application of traditional regulations from US EPA, CARB, or SCAQMD. Key feedback from stakeholders during the past year have pointed to the need to ensure that any regulations do not preclude the application of incentive funding. Typical incentive funding

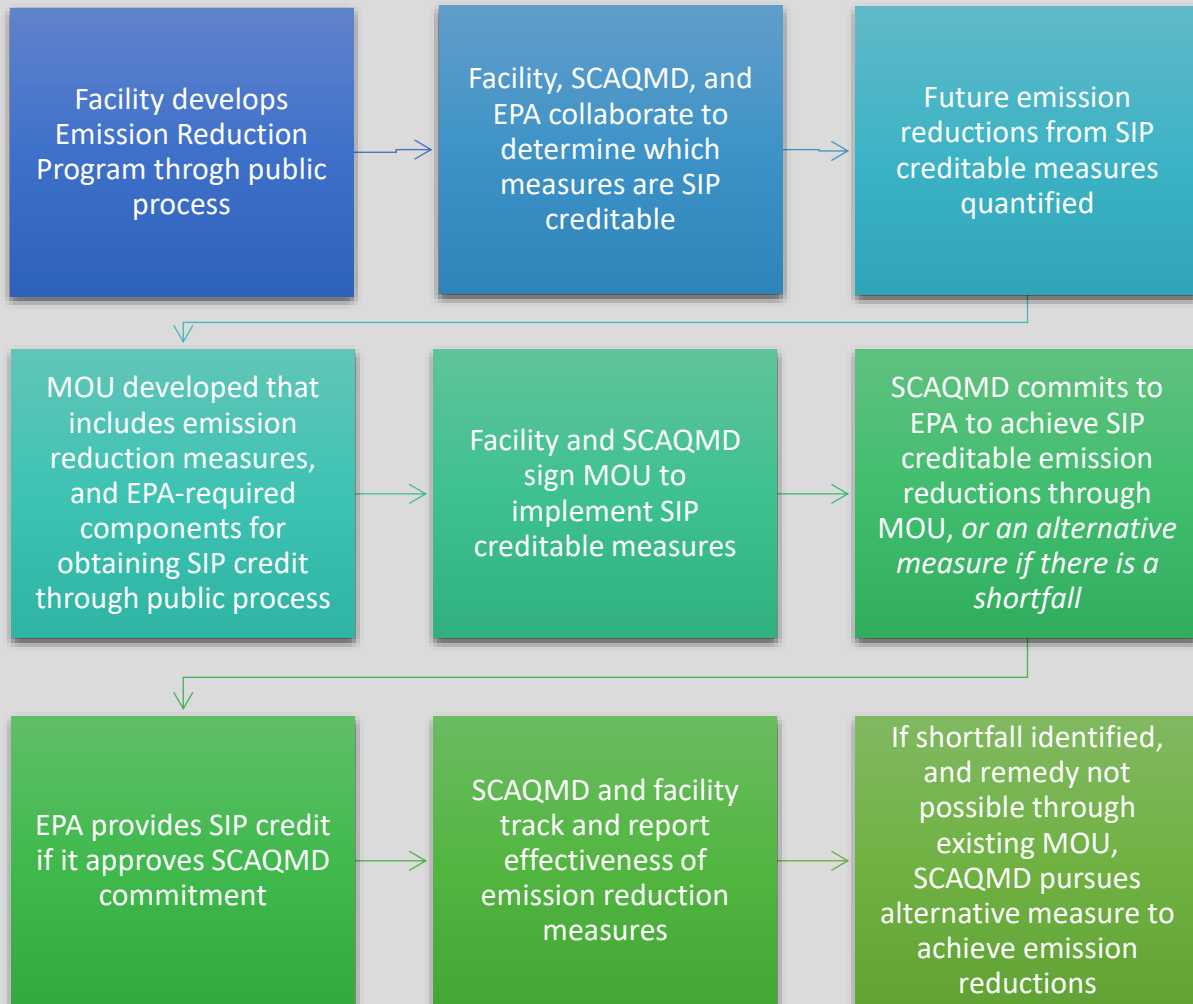
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<sup>1</sup> <https://www.arb.ca.gov/railyard/1998agree/1998agree.htm>

programs do not allow funds to be used to comply with an existing regulation, although there are exceptions.

**Figure 2-4 Potential MOU Pathway**

Over the past year, several stakeholders have expressed interest in a potential Memorandum of Understanding (MOU) approach instead of a regulation. One potential pathway for an MOU approach is outlined below, though other approaches are also possible.



## **Emission Reduction Strategies**

### **Financial Incentives**

During all working group meetings, members highlighted the importance of financial incentives to achieve emission reductions. Efforts outside of the FBMSM working group have been organized to discuss incentive funding<sup>2</sup>. Recent increases in incentive funding have been identified and are being spent as rapidly as possible on cleaner vehicles. However, without significant new funding, additional measures must be pursued to meet the needs of the 2016 AQMP. Importantly, any measures that would be developed should not interfere with mobile fleet owners' ability to receive and use incentive funds. The proposed FBMSMs in Chapter Three are designed to allow fleet owners to pursue incentive funding, while also exploring additional approaches to reduce emissions.

### **Emission Reduction Opportunities**

SCAQMD staff solicited and incorporated emission reduction opportunity concepts from FBMSM working group stakeholders throughout the past year in both public and one-on-one stakeholder meetings. Voluntary measures were exclusively evaluated for most of the year, and initial discussions on potential regulatory strategies have been discussed only where voluntary measures were determined to not provide meaningful emission reductions on their own towards attainment needs.

Staff's recommendation for FBMSM in Chapter Three is based on the following factors:

- All of the feedback received from FBMSM Working Group stakeholders,
- An evaluation of the potential NO<sub>x</sub> reductions by 2023 that could be achieved from currently proposed CARB and US EPA activities, and
- The level of currently identified incentive funding in comparison to the need.

Staff is recommending a mix of voluntary and regulatory strategies designed to accelerate the introduction of cleaner vehicles and equipment into the market based on the factors above and the significant air quality challenge the region faces. The market pull from these voluntary and



regulatory programs can provide a clear signal to ZE/NZE technology manufacturers that mass production is justified (thus lowering the costs to consumers). As these markets continue to develop over the next decade, the voluntary and regulatory programs would be designed to take advantage of these lower costs. The proposed system is also designed such that the voluntary and regulatory measures can complement each other and CARB's strategies, while also still providing the opportunity for fleet owners to take advantage of the financial incentive programs that are underway and growing.

<sup>2</sup> <http://www.aqmd.gov/nav/about/groups-committees/aqmp-advisory-group/2016-aqmp-funding-wg>

## **CHAPTER 3: PROPOSED EMISSION REDUCTION STRATEGIES**

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**OVERVIEW OF PROPOSED EMISSION REDUCTION STRATEGIES**

**NEW DEVELOPMENT AND REDEVELOPMENT (EGM-01)**

**COMMERCIAL MARINE PORTS (MOB-01)**

**RAILYARDS AND INTERMODAL FACILITIES (MOB-02)**

**WAREHOUSE DISTRIBUTION CENTERS (MOB-03)**

**COMMERCIAL AIRPORTS (MOB-04)**

**SUMMARY OF STAFF RECOMMENDATION**

**POTENTIAL SCHEDULE**

## **OVERVIEW OF PROPOSED EMISSION REDUCTION STRATEGIES**

Staff has developed a set of proposed voluntary and regulatory emission reduction strategies for each FBMSM adopted in the 2016 AQMP. Staff's proposed approach to implementing the FBMSMs prioritizes voluntary emission reduction strategies but incorporates the need for regulatory activity, where in staff's assessment, and through the FBMSM Working Group process that voluntary emission reduction strategies are not sufficient to meet the air quality goals of the 2016 AQMP. The proposed voluntary and regulatory emission reduction strategies for each FBMSM are presented below.

## **NEW DEVELOPMENT AND REDEVELOPMENT PROJECTS (EGM-01)**

### **Background Discussion**

The Basin population is projected to increase 12% by 2031, resulting in new residential, commercial, and industrial development activity, according to the Southern California Association of Governments (SCAG). A variety of existing and future programs, such as California's 2016 and 2019 Building Energy Efficiency Standards (i.e., Title 24) will contribute to emission reductions when compared to existing development activity. However, additional vehicle trips, and landscape maintenance equipment and construction emissions from new developments will contribute to regional air pollution. EGM-01 seeks to reduce emissions primarily from project construction by enabling greater deployment of zero and near-zero emission technologies. Total Basin-wide emissions from new development and redevelopment projects, including passenger vehicles and lawn and garden equipment, result in approximately 22 tons per day of NO<sub>x</sub> (Figure 2-2).

In recent years project developers and local jurisdictions have actively explored and implemented innovative policies that reduce emissions. One recent example includes the Net Zero Newhall Ranch development project located in the Santa Clarita Valley of Los Angeles County. The project is committed to reducing or mitigating the project's greenhouse gas emissions to zero. While net-zero greenhouse gas emission projects do not necessarily target NO<sub>x</sub> emission reductions they may provide quantifiable co-benefits of NO<sub>x</sub> and other criteria pollutant emissions. Another example includes Clean Construction policies used by LA Metro, LAX, and the Ports. These policies generally provide a step-down approach, where project developers must use Tier 4 final equipment, but are allowed to use lower tiered equipment if certain criteria are met (such as an inability to identify any manufacturers of a particular type of Tier 4 final equipment). While these policies reduce emissions for these specific projects, it is unclear if these are SIP creditable due to the complexity of determining if they are surplus emission reductions. Finally, as part of the California Environmental Quality Act (CEQA) process, some projects have chosen to contribute money to an air quality mitigation fund that would be used to incentivize the purchase and use of cleaner equipment elsewhere.

Several air districts throughout the state have adopted ISRs to address emissions from new and redevelopment projects.<sup>1</sup> Common approaches in these rules include an emissions threshold test to determine the applicability of the rule, and mitigation fees and/or demonstrations that feasible mitigation measures have been implemented. Under state law, Districts must meet state air quality

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<sup>1</sup> Air districts with ISR programs include: Colusa APCD, Great Basin Unified APCD, Imperial APCD, Mendocino APCD, and San Joaquin Valley APCD.

standards at the “earliest practicable date” using “every feasible measure” Health & Safety Code § 40913 and 40914]. SCAQMD is not required to adopt an ISR simply because another air district found it feasible. However, a demonstration of infeasibility may be required for this FBMSM in light of the actions taken by other air districts if SCAQMD does not pursue an ISR for this facility sector.

### **Voluntary Emission Reduction Strategies**

Based on the FBMSM Working Group process, SCAQMD staff proposes to further explore voluntary emission reduction strategies for new and redevelopment projects through a variety of new mechanisms, including a SCAQMD-administered CEQA air quality mitigation fund program and the development of new guidance that encourages the use zero-emission technologies in development projects. Under a CEQA air quality mitigation fund administered by SCAQMD, projects could voluntarily contribute funds that SCAQMD would use to fund emission reduction projects. The funds would be directed to cost-effective projects and could potentially be directed back to the community near the project or other priorities designated by the Board. Additionally, SCAQMD staff is proposing to continue collaborating with local utilities, local governments, and the state Energy and Public Utility Commissions to encourage more rapid growth of alternative fuel and/or electric vehicle charging infrastructure. This could also include policies that encourage zero-emission landscaping equipment. Finally, SCAQMD staff will update its CEQA handbook to encourage net-zero developments, installation of charging/fueling infrastructure, use of ZE lawn and garden equipment, and implementation of Clean Construction policies.

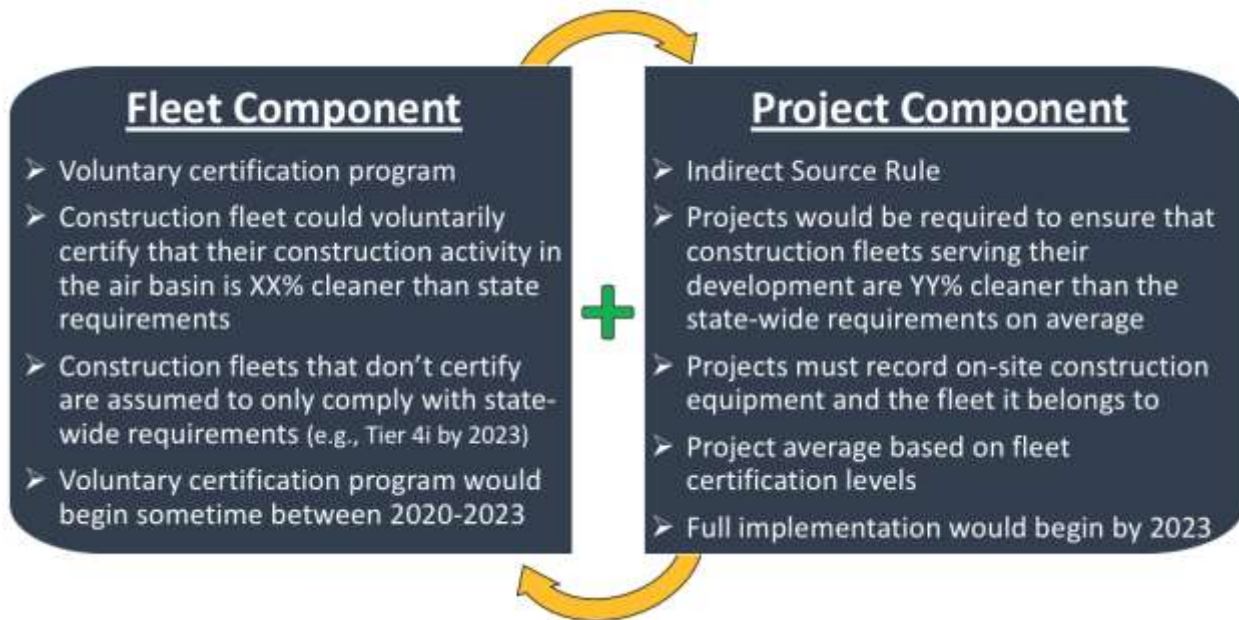
### **Regulatory Emission Reduction Strategies**

The voluntary emission reduction strategies for EGM-01 outlined above could provide important air quality benefits, however they are unlikely to provide substantial NO<sub>x</sub> emission reductions. Therefore, in addition to pursuing voluntary emission reduction strategies SCAQMD staff is proposing to develop an ISR focused on reducing construction emissions (i.e. the most significant source of emissions related to EGM-01). The ISR would be adopted by 2020 with a full phase-in of the ISR requirements by 2023. The ISR would likely focus on projects over a certain size or activity threshold, and would include several compliance options. Potential options could include a new voluntary fleet certification program coupled with a facility/project requirement to utilize at least some certified clean fleets (Figure 3-1), a mitigation fee option, crediting options for activities like installation of charging/fueling infrastructure, or other emission reduction measures.

The voluntary fleet certification program would be developed for construction equipment fleet operators, whereby fleet owners could voluntarily certify that their equipment has lower emissions than current regulatory requirements (e.g., more Tier 4 final equipment than required by CARB). Fleet operators electing not to participate would be classified as meeting existing CARB requirements. Based on feedback received from a construction industry representative, the voluntary fleet certification program could potentially include more flexibility by providing a ‘bubble’ over all of a fleet owner’s equipment such as trucks (subject to CARB’s Truck and Bus rule), construction equipment (subject to CARB’s In-Use Off-Road rule), and portable equipment (subject to CARB’s Portable Equipment Registration Program).



Figure 3-1: ISR Option Concept – Coupled Voluntary Fleet Certification + Facility/Project Requirement



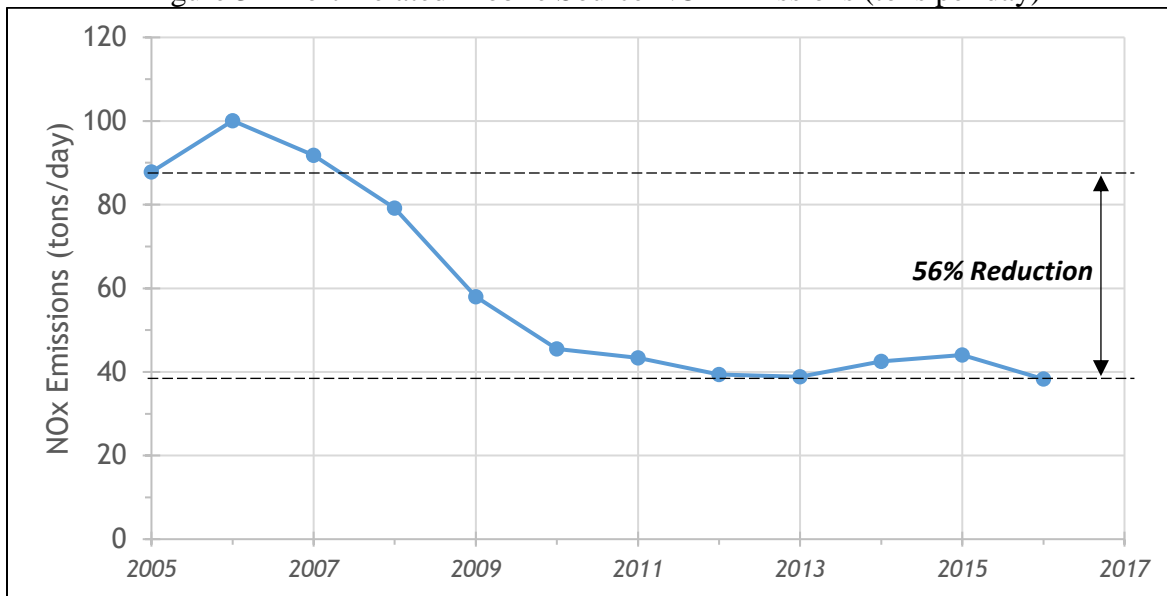
This concept would provide project proponents flexibility and avoid site specific requirements that could restrict a project's ability to use certain types of equipment that may not be readily available. Also, given that the certification program would be voluntary, construction fleets would remain eligible for incentive funding. Additionally, project proponents would not be required to track construction emission level compliance, instead they would be responsible for ensuring that a certified construction fleet(s) is used for the project that exceeds the statewide requirements by a specified level on average. For example, a construction fleet assigned to a project could vary in emission levels (i.e., any % above or below project ISR requirement) as long as the average of all fleets serving the project meet the ISR requirements. The ISR requirements could be supported by substantiating studies (e.g., cost-effectiveness, availability of incentives, feasibility, air quality needs, etc.), and could be modified as conditions change. The voluntary fleet certification program would also be available for other programs (e.g., CEQA mitigation, and other FBMSMs).

## COMMERCIAL MARINE PORTS (MOB-01)

### Background Discussion

The Ports are a significant source of emissions in the Basin and Port-related mobile sources are estimated to generate approximately 35 tpd of NO<sub>x</sub> emissions in 2023 (Figure 2-2). Port-related mobile source emissions have been reduced substantially since 2005 (Figure 3-2), largely due to measures adopted in the 2006 and 2010 Port Clean Air Action Plans (CAAP). The 2010 CAAP Update included a target of a 59% reduction in NO<sub>x</sub> between 2005 and 2023, a level that has nearly been reached today. In the most recent 2017 CAAP Update, the Ports kept this same target for NO<sub>x</sub>, however new targets were included for GHG reductions, including a 40% reduction by 2030 and an 80% reduction by 2050. Measures designed to achieve these new GHG targets should have a co-benefit of reducing NO<sub>x</sub> and other criteria pollutants.

Figure 3-2 Port-Related Mobile Source NOx Emissions (tons per day)



Through the FBMSM Working Group process SCAQMD staff worked closely with the Ports' staff to identify potential voluntary measures that could be pursued through SIP creditable mechanisms for existing Port commitments identified in the 2017 CAAP Update. In order to allow time for the 2017 CAAP Update to be implemented and because of the extensive work that has already gone into the development of the most recent 2017 CAAP Update the SCAQMD staff is proposing to, at this time, pursue the voluntary approach outlined below. If this voluntary approach is unsuccessful, a potential regulatory approach is described. Staff proposes to revisit the potential need for a regulatory approach in the 2019-2020 timeframe.

#### **Voluntary Emission Reduction Strategies for Commercial Marine Ports**

SCAQMD staff is proposing to continue to seek incentive-based emission reduction opportunities that could introduce cleaner ships at the Ports before 2023 and seek new technology development for ship engine retrofits. Additionally, staff recommends pursuing MOUs with the Ports for specific measures in the 2017 CAAP Update, including the updated Clean Truck Program and the CHE Procurement Planning. The purpose of these MOUs would be to ensure SIP creditable emission reductions. The MOUs could follow the pathway outlined in Figure 2-4, or another process that results in SIP creditable emission reductions.

#### **Regulatory Emission Reduction Strategies for Commercial Marine Ports**

Given the work that the Ports are conducting to implement the 2017 CAAP, the SCAQMD staff is not recommending developing an ISR to cover Port activities at this time. Instead staff is proposing to re-evaluate the proposed approach for Ports from 2019 to 2020 since the Clean Truck Program and CHE Procurement Planning measures in the CAAP have substantial implementation milestones during this timeframe.. Staff will continue to work with the Ports to successfully implement the elements of the 2017 CAAP.

In the event that the above recommended voluntary emission reduction strategies do not sufficiently advance the objectives of the 2016 AQMP commitments for control measure MOB-

01, SCAQMD staff would return to the Board to seek direction regarding the pursuit of a potential ISR for Ports. One potential concept that was explored with the Ports FBMSM Working Group included a rule that would apply to Port terminal operators. For this concept, terminal operators would be required to submit a detailed existing emissions inventory from all sources, submit a plan to reduce emissions from mobile sources associated with their facility and/or reduce emissions based on best management practices (e.g., either a measure-based or target-based approach). Also, facilities already achieving best-in-practice emission reduction strategies could have fewer or no new emission reduction requirements. If needed, the likely implementation milestones for a Port ISR would be in years 2023 and 2031 to coincide with key attainment dates. SCAQMD staff would explore the benefits/drawbacks of different regulatory approaches during future rulemaking if directed by the Board.

## **RAIL YARDS AND INTERMODAL FACILITIES (MOB-02)**

### **Background Discussion**

There are nine major freight rail yards and intermodal facilities located outside of the Ports and within the jurisdiction of the SCAQMD. In addition, the South California Regional Rail Authority (Metrolink) and Amtrak provide commuter rail transportation in the SCAQMD. Metrolink maintains their passenger locomotives at two locations in the Basin. A variety of emission sources are related to rail yard operations including locomotives, on-road heavy-duty trucks, cargo-handling equipment, transportation refrigeration units (TRUs), and maintenance shops, and each particular rail yard has a unique operational and emissions profile. While most of the emissions associated with rail yards in the inventory estimate shown in Figure 2-2 are from locomotives, the vast majority of these emissions do not occur in a rail yard itself, and are distributed throughout the rail network in the Basin as locomotives travel to their destinations.

The only significant requirements affecting freight locomotive emissions are US EPA requirements for locomotive engine manufacturers to produce Tier 4 engines starting in 2015, and for the two Class I railroad operators (UP and BNSF) to comply with the 1998 agreement with CARB to ensure that their average South Coast Air Basin locomotive fleet average emission rate is equivalent to or better than US EPA's Tier 2 standards. Without a regulatory requirement, significant turnover of the freight locomotive fleet to Tier 4 is not expected in the near future based on information from railroad representatives and recent media reports. Recent reporting from the railroads as part of the 1998 MOU shows that about 3% of locomotives are Tier 4 today. As a result, the assumption in CARB's locomotive inventory in the 2016 AQMP that ~40-50% of locomotives in the Basin will be Tier 4 by 2023 may need to be revisited, and emissions may be higher in the future than currently projected.

The District's regulatory authority pertaining to rail yards is different than for other facility types as it is subject to the Interstate Commerce Commission Termination Act (ICCTA)<sup>2</sup>. If an apparent conflict arises between ICCTA and another federal law (such as a rule in an US EPA-approved SIP), then the two laws must first be harmonized before the air quality rule can be enforced. State laws that are not in the SIP are also subject to ICCTA unless they are of general applicability and they do not unreasonably burden railroad activity.

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<sup>2</sup> *Association of American Railroads v. SCAQMD*, 622 F. 3d 1094 (9<sup>th</sup> Cir. 2010)

### **Voluntary Emission Reduction Strategies**

Evaluating efficiency improvements such as facility reconfigurations or installation of emission control technologies like hood-type exhaust-capture devices at rail yards has been discussed in the FBMSM Rail Yards Working Group, however no specific commitment to pursuing these kinds of controls has been put forward by the railroad companies. Additionally, industry representatives noted possible fuel efficiency benefits from locomotive aerodynamic devices (yielding about a 1% reduction in fuel use during long haul operations). These voluntary strategies will continue to be pursued where feasible based on stakeholder input. SCAQMD staff is also open to exploring opportunities for a new agreement with rail companies to reduce emissions, such as accelerating the use of Tier 4 locomotives throughout the Basin, however the railroads have not expressed an interest in this approach thus far.

### **Regulatory Emission Reduction Strategies**

Staff recommends initiating rulemaking for an ISR for rail yards due to a limited potential for significant emission reductions from the above proposed strategies, and due to the historically poor air quality in communities near rail yards. One possible ISR approach could be a two-phased SCAQMD regulation which would first require rail yard-specific emissions inventories that cover all emission sources at a rail yard. The second phase could then require a percentage reduction in rail yard NO<sub>x</sub> emissions for future years, with key milestones likely in 2023 and 2031. As an alternative, the ISR could establish railroad-wide emission reduction targets provided measures were in place to reduce localized impacts. Many potential emission reduction alternatives are commercially available, and rail yards would develop programs tailored to their unique operating parameters. Based on working group discussions, compliance alternatives could include preferential routing of cleaner locomotives, use of cleaner switcher locomotives, installation of hood technologies to capture some locomotive exhaust emissions, ZE/NZE cargo handling equipment (CHE) and increased use of ZE transportation refrigeration units (TRU). Other compliance options could include establishment of a mitigation fees or use of truck fleet and construction equipment certification programs that are similar to those described under the warehouse distribution center and new development/redevelopment FBMSM categories. SCAQMD rail yard ISR efforts would also be coordinated with regulations proposed or developed by CARB. Depending on the rail yard ISR structure, any conflicts with other federal laws would require resolution before the rule could be enforced. Examples could include harmonization with the ICCTA, an EPA waiver (e.g., for an in-use engine standards), etc. Additionally, information gained through the ISR emissions reporting process would be used to refine the existing rail emissions inventory and may result in inventory adjustments if supporting information can be identified.

## **WAREHOUSE DISTRIBUTION CENTERS (MOB-03)**

### **Background Discussion**

Distribution centers and/or warehouses are facilities that serve as a distribution point for the transfer of goods. Depending on the size and type, a warehouse/distribution center may have hundreds of diesel trucks a day that deliver, load, and/or unload goods, often operating seven days a week. To the extent that these trucks are transporting perishable goods, they are commonly equipped with diesel-powered transport refrigeration units (TRUs). In addition, cargo handling equipment such as forklifts and yard tractors are used to move goods at warehouses. Warehouse employee commute trips also contribute to the overall emissions, however the estimate in Figure

2-2 shows that the majority of NO<sub>x</sub> emissions originate from heavy-duty diesel trucks<sup>3</sup>. Over the past decade, warehouse and distribution centers have been increasing rapidly in size and number throughout the region, and that rate of growth is projected to continue in the future. The greatest growth in warehouses/distribution centers has been in the Inland Empire, with reports of about 15 million square feet per year being added to the regional building stock.

### **Voluntary Emission Reduction Strategies**

Similar to the potential voluntary measures described for the new development/redevelopment FBMSM category, establishment of a SCAQMD-administered CEQA air quality mitigation fund would allow warehouse development projects to opt-in to paying into a mitigation fund to reduce construction or operational emissions. Under the program, collected mitigation fees would be used to reduce NO<sub>x</sub> emissions, such as through financial incentives for fleet owners to purchase cleaner trucks. Another voluntary measure discussed involved working with the California Energy Commission (CEC), the Public Utilities Commission (PUC), and utilities to expand alternative fueling/electric vehicle charging infrastructure for heavy duty vehicles, especially targeting warehousing areas with high levels of truck activity. Establishment of a “Green Delivery Option” was also discussed as a potential voluntary measure to reduce warehouse distribution center NO<sub>x</sub> emissions. This proposal would involve a small, voluntary opt-in surcharge for consumers when purchasing goods online and funds generated would be used to reduce truck fleet emissions. Efforts to reduce truck fleet emissions must include a continued focus on costs, and on ways to potentially reduce costs and ensure equitable access to cleaner technologies. Other potential strategies such as additional funding programs, alternative financing mechanisms, and truck exchange programs with areas outside the Basin will also continue to be explored by staff.

While the strategies described above may result in air quality benefits and should be pursued, they are unlikely to produce significant SIP creditable emission reductions. In addition, due to the large number of warehouses in the Basin, a voluntary plan-based approach (e.g., CAAPs) for warehouses is infeasible. For these reasons, and to ensure a level playing field for all warehouses, staff is recommending a regulatory approach for this sector in addition to the voluntary strategies above.

### **Regulatory Emission Reduction Strategies**

Similar to the approach described for new/redevelopment projects, the warehouse distribution center ISR would provide several compliance options that facilities could choose to follow. One approach could include a voluntary fleet certification option for truck fleet owners coupled with a requirement ensuring fleets that serve their facility on average are cleaner than required by CARB regulations. The facility level would be set during rulemaking, and would be substantiated with evaluations of cost-effectiveness, the level of incentive funding, feasibility, air quality need, etc. As each of these factors change through time, the facility requirement could also change. These requirements would not preclude individual trucks or truck fleets that do not participate in the proposed voluntary fleet certification program from serving warehouse distribution centers since the proposed concept is seeking emissions reductions based on overall indirect source emissions generated by the warehouse distribution center. Other options could include a mitigation fee, crediting options for other activities like installation of charging/fueling infrastructure for cleaner trucks and TRUs, conversion of CHE to ZE technology, or other options developed during

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<sup>3</sup> The estimate in Figure 2-2 for warehouses likely presents an upper end, conservative estimate of trucking emissions due to limited data availability and uncertainties for calculating a bottom-up inventory for this facility sector.

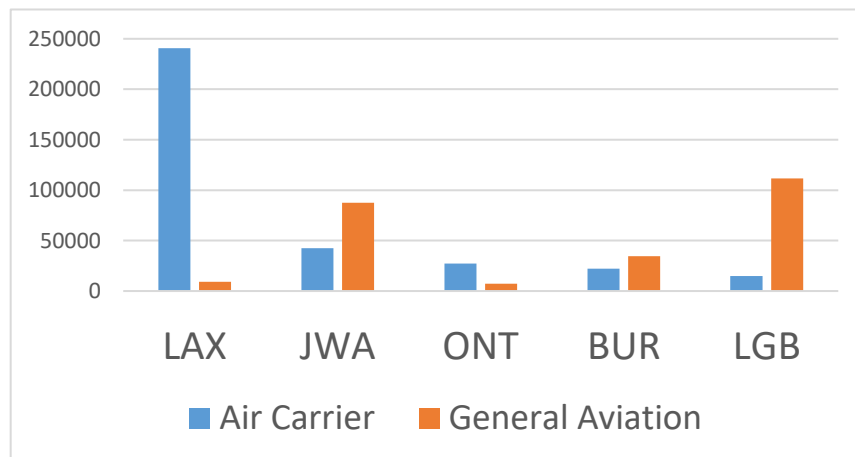
rulemaking. If an ISR is pursued, additional work would be needed to ensure that the options provided in the rule would be feasible with minimal if any modifications to the business practices used by warehouses (for example, many warehouses operators don't own their building or the truck fleets that serve them).

## COMMERCIAL AIRPORTS (MOB-04)

### Background Discussion

FBMSM MOB-04 focuses on the Basin's five commercial airports, including Los Angeles International Airport (LAX), John Wayne Airport (JWA), Ontario California International Airport (ONT), Hollywood Burbank Airport (BUR) and Long Beach Airport (LGB). While aircraft are not the only source of emissions at airports, however, landing/take-off (LTO) data provides a considerable level of information about airport facilities' emissions (Integra, 2016). For example, LTO data can be a surrogate for the number of visitors thereby vehicle traffic volumes associated with an airport or the GSE needs of an airport. Figure 3-3 below, shows 2012 LTO data by aircraft type (air carrier [airline] and general aviation [non-airline]). As shown in the Figure, LAX has by far the largest number of air carrier LTOs while JWA and LGB have the greatest number of general aviation flights. Basin-wide emissions from commercial airport facilities result in approximately 24 tons per day of NO<sub>x</sub> (Figure 2-2), with aircraft producing about two-thirds of the emissions.

Figure 3-3. Landing Take-Off (LTO) Activity by Aircraft Type



Many policies that reduce emissions have been pursued by commercial airports have been implemented in recent years. For example, LAX has implemented alternative fuel policy for vehicles >8,500 pounds GVWR, a ground support equipment emission standard, an electric vehicle purchasing policy, a clean construction policy, gate electrification projects, and a new Landside Access Modernization Program to reduce emissions from passenger vehicles. JWA and Burbank have adopted mitigation measures under the California Environmental Quality Act (CEQA) such as policies for GSE electrification, gate electrification, and installation of electric vehicle chargers and support for alternatively fueled taxis and shuttles. LGB has also pursued similar measures through its LGB Green Airport program, including consolidated parking (which reduced the need for shuttles), GSE electrification, and installation of solar panels.

While aircraft make up a substantial portion of airport-related emissions it has become evident through the working group process that this source of emissions presents a particularly unique challenge given the existing regulatory landscape for aircraft and the nature of aircraft activity (e.g., interstate and international origins and destinations). The remaining (i.e., minus aircrafts) emissions from this facility sector are about 8 tons per day, with about 5 of those tons coming from trucks serving the cargo operations at LAX and ONT.

When the 2016 AQMP was adopted, the Board approved a motion to amend MOB-04 and directed staff to *“Undertake a stakeholder process and draft for our consideration an indirect source rule for commercial airports within the South Coast Basin by February 1, 2019 to control emissions of NOx, PM2.5, lead and diesel particulate matter from non-aircraft sources”*. Some of the Board discussion accompanying this amendment provided further direction, including a desire to let the airports prepare their own airport-specific Clean Air Action Plans (AirCAAPs). During the Airport FBMSM Working Groups, many stakeholders also expressed a concern that if airports are required to implement a measure (e.g., through a rule), they would be prohibited from seeking incentive funding, such as Voluntary Emission Low Emission Program or VALE or ZEV grants available from the Federal Aviation Administration.

At the request of many stakeholders, staff facilitated a discussion of how a potential MOU process could work in the most recent Airport Working Group. Key topics included preliminary key principles of an MOU process, potential elements of an MOU, and how the MOU process could work (see Figure 2-4 for an example). Key feedback received from stakeholders included: a strong desire by airports to pursue a measure-based approach instead of an emissions target-based approach, ensuring that the District commits to the emission reduction to the US EPA (e.g., through the MOU, or an alternate process if the MOU does not achieve the desired outcome) instead of the airports, avoiding additional processes where a citizen suit could be brought against airports, leaving aircraft emissions out of any AirCAAP and MOU, and not restricting airports ability to carry out projects, particularly in relation to general conformity.

### **Voluntary Emission Reduction Strategies**

Staff is recommending to pursue a voluntary MOU approach at this time because of the limited emissions reductions that may be available from the non-aircraft sources in this sector, the complications with regulating airports due to overlapping federal jurisdiction, the existence of many existing emission reduction programs, and the potential willingness of airports to enter into cooperative agreements.. SCAQMD staff is proposing that commercial airport operators in the Basin each develop their own AirCAAP. Given the unique challenges with reducing emissions from airports an AirCAAP would provide airport operators with a level of flexibility that is desirable to develop suitable emissions reduction strategies that avoid interference with the regulatory landscape of aircraft related activity and the day-to-day operations of commercial airports affected by national and global commerce. Key elements of the AirCAAP(s) would include a detailed emissions inventory of all sources both under direct and indirect airport control, emission reduction measures (e.g., incentives, fleet policies, etc.) and measurable goals. Airports would determine the appropriate public process and necessary approvals for their AirCAAPs.

As a potential component of each airports AirCAAP, or perhaps as a separate effort, the airports have expressed a desire to continue to pursue VALE/ZEV funding from FAA. This nationwide program provides competitive grants to airports in non-attainment areas for voluntary projects that

improve air quality. In the past ten years, total nationwide annual funding for this program has varied from about \$6 million to about \$37 million. In this time, only a single VALE grant has been provided to one of the five commercial airports in the Basin, a \$4 million grant to LAX to provide off-terminal gate electrification. Similar to the marine ports CAAP measure that requires terminal operators to submit a procurement plan for cargo handling equipment, one concept that has been explored is for all of the airports to put forward their proposed projects that may be eligible for VALE/ZEV funding. Collectively, the group of airports and the District could advocate to FAA to increase funding here, especially since this program is restricted to non-attainment areas, and our region faces unique air quality challenges compared to the rest of the nation.

In order to ensure that all five of the airports will agree to this approach, staff recommends reporting back to the Board no later than summer 2018. All five airports will be asked to provide written confirmation that they will pursue an AirCAAP, with a goal of approving the AirCAAP no later than January 2020. By mid-2020, the District and the airports would approve an MOU covering SIP creditable components of each airport's AirCAAP.

**Regulatory Emission Reduction Strategies**

For the reasons stated above, SCAQMD staff is not recommending pursuing development of an ISR for airports at this time. We believe that development of the AirCAAPs, combined with MOUs will provide a faster route to achieving emission reductions. However, in the event that the commercial airport CAAP and MOU approach does not appear workable, SCAQMD staff would recommend consideration of an airport ISR by February 1, 2019. One potential ISR concept could include a rule that mirrors the AirCAAP process outlined above. Commercial airports that would have previously identified emission reduction strategies through their own AirCAAP process and participated in an MOU would instead be required to prepare an airport-specific plan subject to a District rule to reduce emissions from all non-aircraft sources.



## SUMMARY OF STAFF RECOMMENDATION

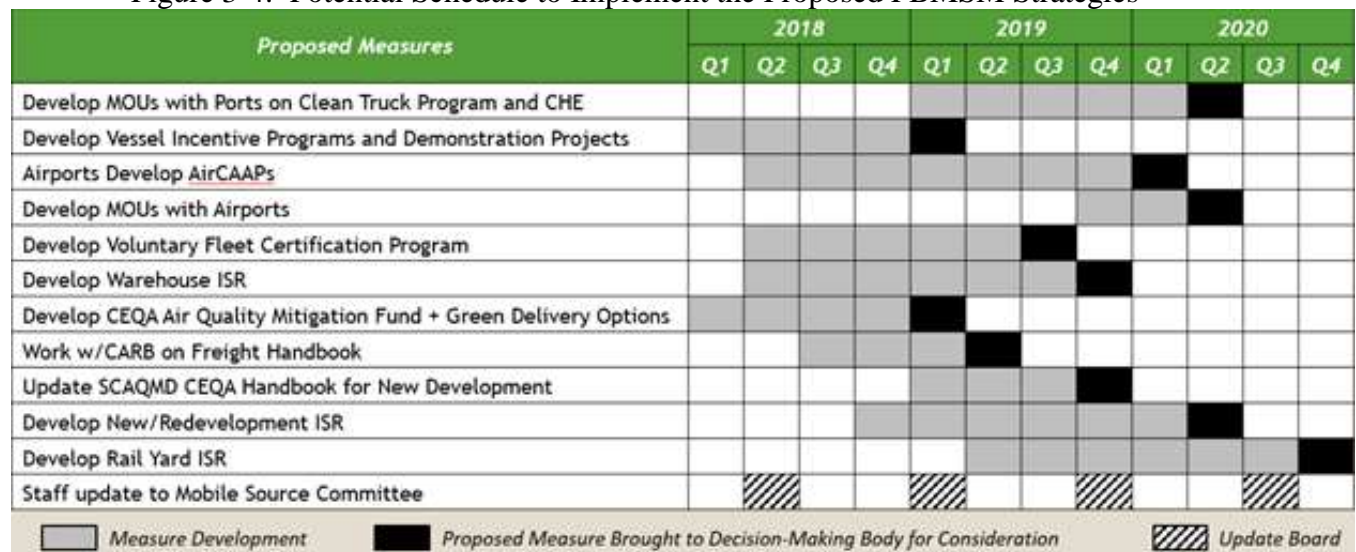
SCAQMD staff’s proposed voluntary and regulatory emissions reduction strategies for each FBMSM adopted in the 2016 AQMP and discussed above are summarized in Table 3-1: Summary of FBMSM Voluntary and Regulatory Emission Reduction Strategies, below.

Table 3-1: Summary of FBMSM Voluntary and Regulatory Emission Reduction Strategies

FBMSM Facility Sector	Pursue Voluntary Measures Now?	Also Pursue Regulatory Measures Now?
<b>Ports</b>	Yes	No
<b>Airports</b>	Yes	No
<b>Warehouses</b>	Yes	Yes
<b>New / Redevelopment</b>	Yes	Yes
<b>Rail Yards</b>	Yes	Yes

**POTENTIAL SCHEDULE** SCAQMD staff proposes the schedule presented in Figure 3-4: to implement the proposed voluntary and regulatory emission reduction strategies discussed above.

Figure 3-4: Potential Schedule to Implement the Proposed FBMSM Strategies



## REFERENCES

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Integra Environmental Consulting, Inc., 2016. Technical Assistance Related to Emission Inventories, Goods Movement and Off-Road Sources, Updated Aircraft Emission Inventory; August 2016

SCAQMD Final 2016 Air Quality Management Plan, Approved March 3, 2017.  
<http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>

SCAQMD Facility Based Measures website:  
<http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures>

US EPA Guidance Documents Related to Obtaining SIP Credit from Voluntary Emission Reduction Programs:

-Diesel Retrofit SIP Programs (2014)

<http://nepis.epa.gov/Exe/ZyPDF.cgi/P100HP2S.PDF?Dockey=P100HP2S.PD>

-Energy Efficiency and Renewable Energy SIP Measures (2004)

[www.epa.gov/sites/production/files/2016-05/documents/ereseerem\\_gd.pdf](http://www.epa.gov/sites/production/files/2016-05/documents/ereseerem_gd.pdf)

-Improving Air Quality with Economic Incentive Programs (2001)

[www.epa.gov/sites/production/files/2015-07/documents/eipfin.pdf](http://www.epa.gov/sites/production/files/2015-07/documents/eipfin.pdf)

-Incorporating Bundled Measures in a SIP (2005)

[www3.epa.gov/ttn/naaqs/aqmguide/collection/cp2/20050816\\_page\\_incorporating\\_bundled\\_measure\\_sip.pdf](http://www3.epa.gov/ttn/naaqs/aqmguide/collection/cp2/20050816_page_incorporating_bundled_measure_sip.pdf)

-Incorporating Energy Efficiency/Renewable Energy Policies and Programs into SIPs (2012)

[www.epa.gov/sites/production/files/2016-05/documents/eeremanual\\_0.pdf](http://www.epa.gov/sites/production/files/2016-05/documents/eeremanual_0.pdf)

-Voluntary Mobile Source SIP Programs (1997)

[www.epa.gov/sites/production/files/2016-05/documents/vmep-gud.pdf](http://www.epa.gov/sites/production/files/2016-05/documents/vmep-gud.pdf)

-Voluntary and Emerging SIP Measures (2004)

[www.epa.gov/sites/production/files/2016-05/documents/voluntarycontrolmeasurespolicyepa.pdf](http://www.epa.gov/sites/production/files/2016-05/documents/voluntarycontrolmeasurespolicyepa.pdf)



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

## Rule 2202 Summary Status Report

### Activity for January 1, 2018 to January 31, 2018

Employee Commute Reduction Program (ECRP)	
# of Submittals:	21

Emission Reduction Strategies (ERS)	
# of Submittals:	42

Air Quality Investment Program (AQIP) Exclusively		
County	# of Facilities	\$ Amount
Los Angeles	3	\$ 6,636
Orange	1	\$ 12,150
Riverside	0	\$ 0
San Bernardino	1	\$ 2,430
<b>TOTAL:</b>	<b>5</b>	<b>\$ 21,215</b>

ECRP w/AQIP Combination		
County	# of Facilities	\$ Amount
Los Angeles	2	\$ 12,570
Orange	0	\$ 0
Riverside	0	\$ 0
San Bernardino	0	\$ 0
<b>TOTAL:</b>	<b>2</b>	<b>\$ 12,570</b>

### Total Active Sites as of January 31, 2018

ECRP (AVR Surveys)			TOTAL Submittals w/Surveys	AQIP	ERS	TOTAL
ECRP <sup>1</sup>	AQIP <sup>2</sup>	ERS <sup>3</sup>				
500	19	3	522	104	728	1,354
36.93%	1.4%	0.22%	38.55%	7.68%	53.77%	100% <sup>4</sup>

### Total Peak Window Employees as of January 31, 2018

ECRP (AVR Surveys)			TOTAL Submittals w/Surveys	AQIP	ERS	TOTAL
ECRP <sup>1</sup>	AQIP <sup>2</sup>	ERS <sup>3</sup>				
375,344	6,448	342	382,134	15,348	338,105	735,587
51.03%	.88%	0.05%	51.95%	2.09%	46.96%	100% <sup>4</sup>

- Notes:**
1. ECRP Compliance Option.
  2. ECRP Offset (combines ECRP w/AQIP). AQIP funds are used to supplement the ECRP AVR survey shortfall.
  3. ERS with Employee Survey to get Trip Reduction credits. Emission/Trip Reduction Strategies are used to supplement the ECRP AVR survey shortfall.
  4. Totals may vary slightly due to rounding.

DRAFT

BOARD MEETING DATE: March 2, 2018

AGENDA NO.

REPORT: Lead Agency Projects and Environmental Documents Received By SCAQMD

SYNOPSIS: This report provides, for the Board's consideration, a listing of CEQA documents received by the SCAQMD between January 1, 2018 and January 31, 2018, and those projects for which the SCAQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: Mobile Source, February 16, 2018; Reviewed

RECOMMENDED ACTION:  
Receive and file.

Wayne Nastri  
Executive Officer

PF:SN:MK:LS:LW

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**CEQA Document Receipt and Review Logs (Attachments A and B)** – Each month, the SCAQMD receives numerous CEQA documents from other public agencies on projects that could adversely affect air quality. A listing of all documents received and reviewed during the reporting period January 1, 2018 through January 31, 2018 is included in Attachment A. A list of active projects from previous reporting periods for which SCAQMD staff is continuing to evaluate or has prepared comments is included in Attachment B. A total of 83 CEQA documents were received during this reporting period and 19 comment letters were sent. A notable project in this report is the Pier B On-Dock Rail Support Facility Project at the Port of Long Beach.

The Intergovernmental Review function, which consists of reviewing and commenting on the adequacy of the air quality analysis in CEQA documents prepared by other lead agencies, is consistent with the Board's 1997 Environmental Justice Guiding Principles and Environmental Justice Initiative #4. As required by the Environmental Justice Program Enhancements for FY 2002-03 approved by the Board in October 2002, each of the attachments notes those proposed projects where the SCAQMD has been contacted regarding potential air quality-related environmental justice concerns. The SCAQMD

has established an internal central contact to receive information on projects with potential air quality-related environmental justice concerns. The public may contact the SCAQMD about projects of concern by the following means: in writing via fax, email, or standard letters; through telephone communication; as part of oral comments at SCAQMD meetings or other meetings where SCAQMD staff is present; or by submitting newspaper articles. The attachments also identify for each project the dates of the public comment period and the public hearing date, if applicable, as reported at the time the CEQA document is received by the SCAQMD. Interested parties should rely on the lead agencies themselves for definitive information regarding public comment periods and hearings as these dates are occasionally modified by the lead agency.

At the January 6, 2006 Board meeting, the Board approved the Workplan for the Chairman's Clean Port Initiatives. One action item of the Chairman's Initiatives was to prepare a monthly report describing CEQA documents for projects related to goods movement and to make full use of the process to ensure the air quality impacts of such projects are thoroughly mitigated. In response to describing goods movement, CEQA documents (Attachments A and B) are organized to group projects of interest into the following categories: goods movement projects; schools; landfills and wastewater projects; airports; general land use projects, etc. In response to the mitigation component, guidance information on mitigation measures were compiled into a series of tables relative to: off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases. These mitigation measure tables are on the CEQA webpages portion of the SCAQMD's website at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>. Staff will continue compiling tables of mitigation measures for other emission sources, including airport ground support equipment and other sources.

As resources permit, staff focuses on reviewing and preparing comments for projects: where the SCAQMD is a responsible agency; that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement, etc.); that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); where environmental justice concerns have been raised; and those projects for which a lead or responsible agency has specifically requested SCAQMD review. If staff provided written comments to the lead agency as noted in the column "Comment Status," there is a link to the "SCAQMD Letter" under the Project Description. In addition, if staff testified at a hearing for the proposed project, a notation is provided under the "Comment Status." If there is no notation, then staff did not provide testimony at a hearing for the proposed project.

During the period January 1, 2018 through January 31, 2018, the SCAQMD received 73 CEQA documents. Of the total of 99 documents\* listed in Attachments A and B:

- 19 comment letters were sent;
- 35 documents were reviewed, but no comments were made;
- 23 documents are currently under review;
- 4 documents did not require comments (e.g., public notices);
- 0 documents were not reviewed; and
- 18 documents were screened without additional review.

\* These statistics are from January 1, 2018 to January 31, 2018 and may not include the most recent “Comment Status” updates in Attachments A and B.

Copies of all comment letters sent to lead agencies can be found on the SCAQMD’s CEQA webpage at the following internet address:

<http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

**SCAQMD Lead Agency Projects (Attachment C)** – Pursuant to CEQA, the SCAQMD periodically acts as lead agency for stationary source permit projects. Under CEQA, the lead agency is responsible for determining the type of CEQA document to be prepared if the proposal is considered to be a “project” as defined by CEQA. For example, an Environmental Impact Report (EIR) is prepared when the SCAQMD, as lead agency, finds substantial evidence that the proposed project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if the SCAQMD determines that the proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are written statements describing the reasons why proposed projects will not have a significant adverse effect on the environment and, therefore, do not require the preparation of an EIR.

Attachment C to this report summarizes the active projects for which the SCAQMD is lead agency and is currently preparing or has prepared environmental documentation. As noted in Attachment C, the SCAQMD continued working on the CEQA documents for five active projects during January.

#### **Attachments**

- A. Incoming CEQA Documents Log
- B. Ongoing Active Projects for Which SCAQMD Has or Will Conduct a CEQA Review
- C. Active SCAQMD Lead Agency Projects

























**ATTACHMENT A  
INCOMING CEQA DOCUMENTS LOG  
January 01, 2018 to January 31, 2018**

**DRAFT**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Retail</b> <b>SBC180112-06</b> Hotel & Casino Expansion Project	The proposed project consists of construction of 795,000 square feet of entertainment and hospitality facilities including a hotel with 500 rooms, a performance venue with 4,000 seats, and subterranean parking on 70 acres. The project is located on the northwest corner of East Lynwood Drive and North Victoria Avenue within and adjacent to the existing San Manuel Casino on the Tribe's Reservation. Reference SBC171110-05  Comment Period: 1/10/2018 - 2/26/2018 Public Hearing: 1/25/2018	Draft Tribal Environmental Impact Report	San Manuel Band of Mission Indians	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC180102-06</b> Sunset & Everett Mixed-Use Development Project and Everett Small Lot Subdivision	The proposed project consists of demolition of a 3,000-square-foot warehouse, an apartment building, a 4,800-square-foot commercial building, and three residential homes. The project will also include construction of six residential homes totaling 10,887 square feet and two buildings with 204 residential units totaling 197,858 square feet on 2.6 acres. The project is located on the northeast corner of North Boylston Street and West Sunset Boulevard in the community of Silver Lake-Echo Park-Elysian Valley. Reference LAC160527-07 and LAC150612-10  Comment Period: N/A Public Hearing: N/A	Response to Comments	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC180102-07</b> Cudahy 2040 General Plan Update	The proposed project consists of construction of 1,448 residential units, 1.8 million square feet of commercial use, 1.3 million square feet of industrial use, and 0.7 million square feet of public and institutional uses on 768 acres. The project is located on the southeast corner of Walnut Street and Salt Lake Avenue.  Comment Period: 12/29/2017 - 2/12/2018 Public Hearing: N/A	Draft Environmental Impact Report	City of Cudahy	** Under review, may submit written comments
<b>General Land Use (residential, etc.)</b> <b>LAC180104-05</b> 6200 West Sunset Boulevard (ENV-2015-3603-EIR)	The proposed project consists of construction of a 243,315-square-foot building with 270 residential units on 1.24 acres. The project is located on the southwest corner of North El Centro Avenue and Sunset Boulevard in the community of Hollywood. Reference LAC160119-01  Comment Period: 1/4/2018 - 2/20/2018 Public Hearing: N/A	Draft Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*\* Disposition may change prior to Governing Board Meeting

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.











**ATTACHMENT A  
INCOMING CEQA DOCUMENTS LOG  
January 01, 2018 to January 31, 2018**

**DRAFT**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<p><i>Plans and Regulations</i></p> <p><b>SBC180119-02</b> Palm Desert Campus 2016 Master Plan</p>	<p>The proposed project consists of development of a planning framework, goals, and programs, and identification of facility needs for future growth in student enrollment. The project is located on the northeast corner of Cook Street and Frank Sinatra Drive in the City of Palm Desert, Riverside County. Reference SBC171012-04</p> <p style="text-align: center;">Comment Period: N/A</p>	Response to Comments	California State University	Document reviewed - No comments sent
	Public Hearing: 1/30/2018			

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*\* Disposition may change prior to Governing Board Meeting

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.









**ATTACHMENT B**  
**ONGOING ACTIVE PROJECTS FOR WHICH SCAQMD HAS**  
**OR IS CONTINUING TO CONDUCT A CEQA REVIEW**

**DRAFT**

SCAQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>General Land Use (residential, etc.)</b> <b>LAC171221-03</b> 1045 Olive Project (ENV-2016-4630-EIR)	The proposed project consists of demolition of four buildings totaling 34,673 square feet, and construction of a 751,777-square-foot building with 794 residential units, 100,652 square feet of open space, and subterranean parking on 41,603 square feet. The project is located on the northwest corner of West 11st Street and South Olive Street in the community of Central City.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/nop1045olive-011618.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/nop1045olive-011618.pdf</a>  Comment Period: 12/21/2017 - 1/19/2018                      Public Hearing: 1/10/2018	Notice of Preparation	City of Los Angeles	SCAQMD staff commented on 1/16/2018
<b>General Land Use (residential, etc.)</b> <b>RVC171226-02</b> 17-TM-02, TM 27357	The proposed project consists of construction of 309 residential units on 106.6 acres. The project is located on the southwest corner of Elm Avenue and Oak Valley Parkway.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/sp17tm02-010518.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/sp17tm02-010518.pdf</a>  Comment Period: 12/21/2017 - 1/11/2018                      Public Hearing: N/A	Site Plan	City of Beaumont	SCAQMD staff commented on 1/5/2018
<b>General Land Use (residential, etc.)</b> <b>RVC171226-03</b> Tentative Tract Map No. 37434 - EA 43092	The proposed project consists of subdivision of 214.7 acres for future development of 600 residential units. The project is located on the northeast corner of Jack Ivey Drive and Varner Road in the community of Western Coachella Valley.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/spttm37434-010218.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2018/spttm37434-010218.pdf</a>  Comment Period: 12/11/2017 - 1/4/2018                      Public Hearing: N/A	Site Plan	County of Riverside	SCAQMD staff commented on 1/2/2018

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*\* Disposition may change prior to Governing Board Meeting

**ATTACHMENT C  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JANUARY 31, 2018**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
Edgington Oil Company (Edgington) is proposing the following modifications at its existing Edgington Refinery site to allow for additional flexibility in using the site for terminal operations: 1) add 18 offloading arms at its existing rail tank car loading facility to allow for the offloading of distillates, biodiesel, and renewables (diesel and jet fuels), ethanol, naphtha, alkylates, reformate, and isooctane; 2) modify seven truck loading racks to allow distillates, biodiesel, and renewables to be loaded; 3) modify one rack (two arms) to allow unloading of crude oil from trucks; and 4) modify 16 existing fixed-roof asphalt storage tanks to allow storage of distillates, biodiesel, and renewables.	Edgington Oil Company	Initial Study (IS)	An Initial Study has been prepared by the consultant and SCAQMD staff has provided comments. The consultant is in the process of revising the Initial Study.	InterAct
The Phillips 66 (formerly ConocoPhillips) Los Angeles Refinery Ultra Low Sulfur Diesel project was originally proposed to comply with federal, state and SCAQMD requirements to limit the sulfur content of diesel fuels. Litigation against the CEQA document was filed. Ultimately, the California Supreme Court concluded that the SCAQMD had used an inappropriate baseline and directed the SCAQMD to prepare an EIR, even though the project has been built and has been in operation since 2006. The purpose of this CEQA document is to comply with the Supreme Court's direction to prepare an EIR.	Phillips 66 (formerly ConocoPhillips), Los Angeles Refinery	Environmental Impact Report (EIR)	The Notice of Preparation/Initial Study (NOP/IS) was circulated for a 30-day public comment period on March 26, 2012 to April 26, 2012. The consultant submitted the administrative Draft EIR to SCAQMD in late July 2013. The Draft EIR was circulated for a 45-day public review and comment period from September 30, 2014 to November 13, 2014. Two comment letters were received and responses to comments are being prepared.	Environmental Audit, Inc.
Quemetco is proposing an increase in the daily furnace feed rate.	Quemetco	Environmental Impact Report (EIR)	A Notice of Preparation/Initial Study (NOP/IS) has been prepared by the consultant and SCAQMD staff has provided comments. The consultant has provided a revised NOP/IS which is undergoing SCAQMD review.	Trinity Consultants

**ATTACHMENT C  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JANUARY 31, 2018**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
<p>Southern California Edison (SCE) is proposing to modify the air pollution control system for the Barre Peaker unit to repair current and prevent future water damage by: 1) decreasing the water-injection rate into the turbine's combustor; 2) replacing the oxidation catalyst and increasing the overall area of catalyst beds in the selective catalytic reduction (SCR) unit; 3) replacing the ammonia injection grid to improve the deliverability of ammonia to the catalyst; and, 4) increasing the concentration of the aqueous ammonia that is delivered to the facility, stored on-site, and injected into the SCR unit from 19% to 29%. In addition, SCE is proposing to revise its SCAQMD Title V Operating Permit to allow the turbine to generate power over its full operating range, from less than one megawatt (MW) to full load (e.g., 45 MW net), while continuing to meet the emission limits in the current permit.</p>	<p>Southern California Edison</p>	<p>Addendum to the April 2007 Final Mitigated Negative Declaration for the Southern California Edison Barre Peaker Project in Stanton</p>	<p>A draft Addendum has been prepared by the consultant and is under review by SCAQMD staff.</p>	<p>Yorke Engineering, LLC</p>
<p>Southern California Edison (SCE) is proposing to modify the air pollution control system for the Mira Loma Peaker unit to repair current and prevent future water damage by: 1) decreasing the water-injection rate into the turbine's combustor; 2) replacing the oxidation catalyst and increasing the overall area of catalyst beds in the Selective Catalytic Reduction (SCR) unit; 3) replacing the ammonia injection grid to improve the deliverability of ammonia to the catalyst; and, 4) increasing the concentration of the aqueous ammonia that is delivered to the facility, stored on-site, and injected into the SCR unit from 19% to 29%. In addition, SCE is proposing to revise its SCAQMD Title V Operating Permit to allow the turbine to generate power over its full operating range, from less than one megawatt (MW) to full load (e.g., 45 MW net), while continuing to meet the emission limits in the current permit.</p>	<p>Southern California Edison</p>	<p>Addendum to the April 2007 Final Mitigated Negative Declaration for the Southern California Edison Mira Loma Peaker Project in Ontario</p>	<p>A draft Addendum has been prepared by the consultant and is under review by SCAQMD staff.</p>	<p>Yorke Engineering, LLC</p>