

Executive Summary

- Despite great strides in cleaning the air over the past several decades, the
 Los Angeles area still has the highest levels of ozone (smog) in the nation.
- Meeting the 2015 federal ozone standard requires reducing emissions of nitrogen oxides (NOx) – the key pollutant that creates ozone – by 71 percent more than is required by adopted rules and regulations in 2037.
- The only way to achieve the required NOx reductions is through extensive use of zero emission technologies across all stationary and mobile sources.
- South Coast Air Quality Management District's (South Coast AQMD)
 primary authority is over stationary sources which account for less than 20
 percent of NOx emissions.
- The overwhelming majority of NOx emissions are from heavy-duty trucks, ships and other State and federally regulated mobile sources that are mostly beyond the South Coast AQMD's control.
- The region will not meet the standard absent significant federal action.
- In addition to federal action, the 2022 Air Quality Management Plan (AQMP) requires substantial reliance on future deployment of advanced technologies to meet the standard.
- The required transition to zero and low emission technologies to meet the standard will be more expensive than traditional control strategies developed for previous federal standards. Ensuring the transition is equitable and affordable will be key to the success of the AQMP.

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Overview

The 17 million residents of the greater Los Angeles area have historically suffered from some of the worst air quality in the nation. While air pollution has reduced greatly, more needs to be done. The region has the worst levels of ground-level ozone (smog) and among the highest levels of fine particulate matter (PM2.5). The air pollution levels in the region exceed both National and California Ambient Air Quality Standards for both these air pollutants. The health impacts associated with the high levels of air pollution cause respiratory and cardiovascular disease, exacerbate asthma, and can lead to premature death. We also know that our Environmental Justice (EJ) communities experience the brunt of the health effects from air pollution. In this document, EJ communities are defined as census tracts in the top 25 percent in the California Office of Environmental Health Hazard Assessment's California Communities Environmental Health Screening Tool (CalEnviroScreen). Approximately 37 percent of the South Coast Air Basin (Basin) residents and 8 percent of Coachella Valley residents live in EJ communities.

The U.S. Environmental Protection Agency (U.S. EPA) requires areas that do not meet a National Ambient Air Quality Standard (NAAQS or standard) to develop and submit a State Implementation Plan (SIP) for approval. SIPs are used to show how the region will meet the standard. Regions must attain NAAQS by specific dates or face the possibility of sanctions by the federal government and other consequences under the Clean Air Act (CAA). This can result in increased permitting fees, stricter restrictions for permitting new projects, and the loss of federal highway funds.

The South Coast AQMD SIPs are developed within the agencies Air Quality Management Plans (AQMP). The most recent AQMP was developed in 2016 and addressed the 1997 8-hour and 2008 8-hour ozone standards, as well as PM2.5 standards. This document is the Draft 2022 AQMP and is focused on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb).

In August 2018, the U.S. EPA designated the Basin as "extreme" nonattainment and the Coachella Valley as "severe-15" nonattainment for the 2015 8-hour ozone standard. The South Coast Air Basin includes large areas of Los Angeles, Orange, Riverside, and San Bernardino counties. The Coachella Valley is the desert portion of Riverside County in the Salton Sea Air Basin. "Extreme" nonattainment areas must attain this standard by August 2038 and "severe" nonattainment areas must attain by August 2033 (Table ES-1).

¹ Full details of the CalEnviroScreen methodology and data sources can be found in the CalEnviroScreen 4.0 report released in October 2021. Available online at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

TABLE ES-1
NONATTAINMENT STATUS OF 2015 8-HOUR OZONE NAAQS

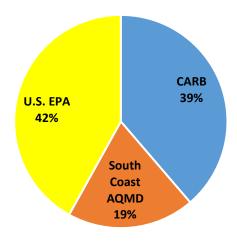
Standard	Nonattainment Area	Classification	Attainment Year
2015 8-Hour Ozone	South Coast Air Basin	Extreme	2037 ²
	Coachella Valley	Severe-15	2032³

The Draft 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

The 2015 8-hour ozone standard is the most stringent standard to date. Because current ozone levels in the Basin are so high, meeting the standard will require substantial emission reductions above and beyond current programs. We project that emissions of NOx – the key pollutant controlling formation of ozone – must be reduced by 71 percent beyond what we would achieve through current programs by 2037 to meet the standard. The magnitude of such an emission reduction means that all sources of emissions must be controlled as stringently as possible. This also means that we will have to rely on flexibilities provided by the Section 182(e)(5) of the CAA, known as "black box" measures, to show that we are able to meet the standard. These "black box" measures can include the development and deployment of future technologies to reduce emissions as well as the reduction of NOx from sources regulated by the federal government. As depicted in Figure ES-1, 42 percent of NOx emissions in 2037 will come from federal sources, while 39 percent will come from State regulated sources, and only 19 percent will come from the South Coast AQMD regulated sources.

Attainment date is August 3, 2038, which is 20 years from the designation as "extreme" nonattainment areas. The U.S. EPA requires that all control measures in the attainment demonstration must be implemented no later than the beginning of the attainment year ozone season. The U.S. EPA also defines the attainment year ozone season is the ozone season immediately preceding a nonattainment area's maximum attainment date, which is August 3, 2038, therefore, 2037 is the attainment year for the basin.

³ Attainment date is August 3, 2033, which is 15 years from the designation as "severe" nonattainment area. The attainment year is the ozone season preceding August 3, 2033, which leads to 2032 as attainment year.



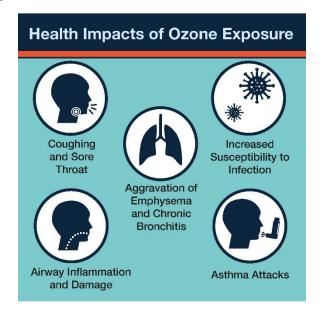
NOx Emissions: 220 Tons per Day

FIGURE ES-1
2037 EMISSIONS INVENTORY BY AGENCY RESPONSIBILITY

Health Effects and Air Quality Trends

Breathing high levels of ozone can cause a variety of negative health impacts such as asthma, chronic bronchitis and emphysema; and increased susceptibility to lung infection. Individuals working outdoors, children, older adults, people with preexisting lung disease, and individuals with certain nutritional deficiencies are the most susceptible to these effects. Exposure to high levels of ozone levels can increase school absences, hospital visits, disease and death.

Improvements in cleaner technology and strict regulations have reduced ozone levels since its peak in the mid-twentieth century. However, ozone levels have remained unacceptably high over the past decade despite significant reductions. This



trend is due to the changes in climate and other weather conditions such as the increase in hot, stagnant days that can lead to the formation of ozone that we have experienced in recent years. While this AQMP predominantly addresses ozone, the trends and attainment status of all criteria air pollutants are presented in Chapter 2 and Appendix 2. The Basin meets federal standards for particulate matter less than 10 microns in diameter (PM10), nitrogen dioxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2) and

lead, but does not meet federal ozone and PM2.5 standards. The Coachella Valley does not meet federal ozone and PM10 standards, but attains federal PM2.5, NO2, and CO standards.⁴

Emissions in the Basin and Reductions Needed for Attainment

Unlike most other air pollutants, ozone is not directly emitted, but instead is formed in the atmosphere. Ozone is formed when NOx and volatile organic compounds (VOCs) react in the presence of sunlight.⁵ While both NOx and VOCs contribute to ozone, the key to attaining the ozone standard is to reduce NOx.

In the Basin, mobile sources – heavy-duty trucks, ships, airplanes, locomotives and construction equipment – account for more than 80 percent of NOx emissions. Meanwhile, stationary sources – such as power plants, refineries, and factories – will be responsible for the remaining 19 percent in 2037. This is an important point as the majority of the South Coast AQMD's regulatory authority is for stationary sources with only limited authority to control mobile sources.

In 2037, we project that 220 tons per day of NOx will be emitted. This is known as the "baseline" and includes the implementation of existing regulations and programs, but does not include the actions proposed in this AQMP. This level is 36 percent lower than NOx emissions in 2018. In order to meet the ozone standard, the amount of NOx that can be emitted into the atmosphere is 63 tons per day and is known as the "carrying capacity." This means that NOx needs to be reduced about 71 percent beyond the current 2037 baseline and about 82 percent below current levels (Figure ES-2).

⁴ Lead and SO2 concentrations were not measured in the Coachella Valley. In 2020, however, historic analyses have shown concentrations to be less than the federal standards and no major sources of these pollutants are located in the Coachella Valley.

⁵ Ozone formation is complex and is described in greater detail in Chapter 2.

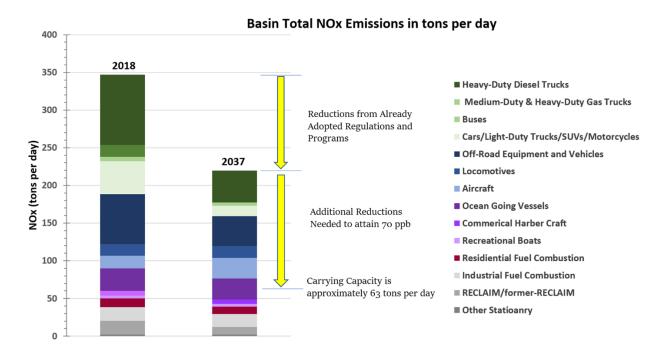


FIGURE ES-2
BASELINE NOX EMISSIONS INVENTORIES AND ADDITIONAL REDUCTIONS REQUIRED TO ATTAIN THE
2015 OZONE STANDARD

Control Strategy

Reducing significant amounts of NOx emissions poses a serious challenge. Previous AQMPs have relied on increasingly stringent regulations targeting tailpipe and exhaust stack emissions, new engine technologies, or fuel mix improvements. However, these approaches rely on additional reductions from already strictly regulated sources, and cannot achieve an additional 71 percent reduction beyond the 2037 baseline. Therefore, there is no viable pathway to achieve the needed reductions without widespread adoption of zero emission (ZE) technologies across all mobile sectors and stationary sources large and small.

An overview of the control strategy by category is shown in Figure ES-3. Low NOx technologies will also need to play a significant role for some areas where ZE technology is not ready or commercially available. These lower emission technologies will also assist with attainment of other air quality standards with earlier deadlines.

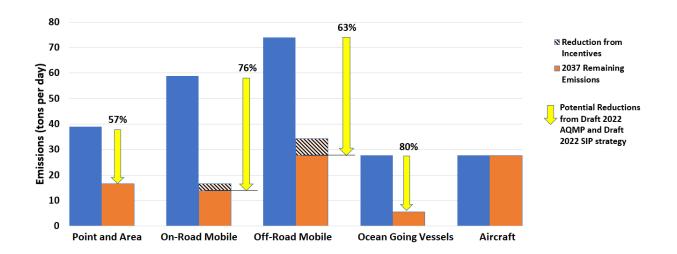


FIGURE ES-3
SUMMARY OF APPROACH TO REDUCING NOX EMISSIONS BY MAJOR SOURCE CATEGORY

The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low NOx technologies and (2) developing new ZE and ultra-low NOx technologies for use in cases where the technology is not currently available. The South Coast AQMD will prioritize distribution of incentive funding in EJ areas and seek opportunities to focus benefits on the most disadvantaged communities. Cost-effectiveness and affordability will be further considered during the rulemaking or incentive program development process.

Given the bulk of the Basin's NOx emissions in 2037 will be coming from federally regulated sources, the South Coast AQMD and the California Air Resources Board (CARB) cannot sufficiently reduce emissions to meet the standard without federal action. It is therefore imperative that the federal government act decisively to reduce emissions from federally regulated sources of air pollution, including interstate heavyduty trucks, ships, locomotives, aircraft, and certain categories of off-road equipment.

Emissions from federal and international sources are estimated to be 92 tons per day in 2037 (see Figure ES-4). Even if all sources regulated by CARB and the South Coast AQMD were zero emissions, federal sources alone would emit substantially more than the 63 tons per day NOx limit, thwarting any other actions to meet the standard.

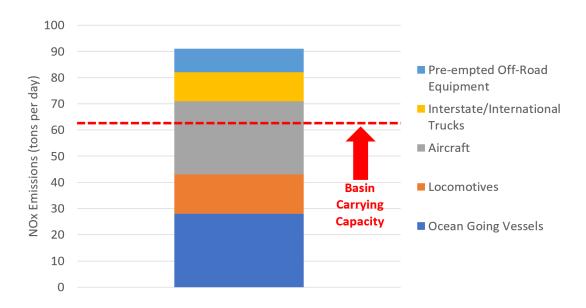


FIGURE ES-4
NOx EMISSIONS IN 2037 FROM SOURCES UNDER FEDERAL JURISDICTION IN RELATION TO THE
CARRYING CAPACITY FOR THE 2015 8-HOUR OZONE NAAQS

Control Measures

The South Coast AQMD proposes a total of 48 control measures for the 2022 AQMP. Thirty control measures targeting stationary sources are categorized into four groups (Figure ES-5). The NOx measures are further grouped by residential combustion, commercial equipment and large equipment. The first two groups mostly target non-permitted sources and have a 70 percent reduction goal by 2037. Large combustion sources have a goal of 37 percent reductions by 2037 and predominantly address permitted equipment. Many control measures focus on widespread deployment of ZE and low NOx technologies through a combination of regulatory approaches and incentives and will require technology assessments to better understand where and when ZE and low NOx technologies can be implemented. New funding and programs are needed for research, development, demonstration, and deployment of advanced technologies.

The residential and commercial measures are frequently referred to as "building measures," which are in line with California's aggressive climate goals to reduce greenhouse gases (GHG) emissions across various sectors. State climate actions such as Title 24 energy code requirements and building electrification (e.g., Assembly Bill 3232) can also help reduce NOx emissions. In addition, as part of the 2022 State SIP Strategy, CARB has proposed a statewide zero GHG emission standard for residential and commercial buildings appliances, which would have criteria pollutant co-benefits. The South Coast AQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others.

In addition to the NOx measures, this AQMP relies on co-benefits from climate and energy efficiency programs for further reductions, limited strategic measures for VOCs reductions and other actions.

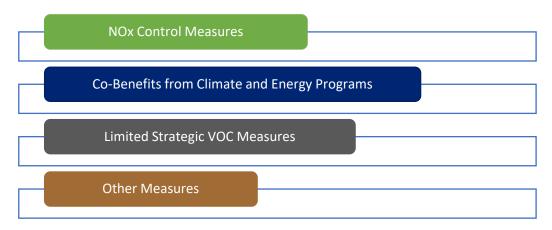


FIGURE ES-5
SOUTH COAST AQMD STATIONARY AND AREA SOURCE CONTROL STRATEGY

The remaining 18 control measures target mobile sources. They are facility-based mobile source measures, emission reductions from incentive programs, and partnerships with local, State, federal, and international entities (Figure ES-6).

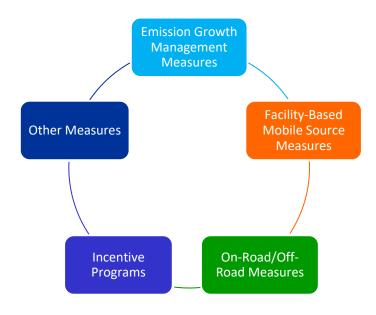


FIGURE ES-6
SOUTH COAST AQMD MOBILE SOURCE CONTROL STRATEGY

Further deployment of cleaner technologies will be necessary to attain the ozone standard. These are the CAA section 182(e)(5) "black box" measures that point to deployment of developing advanced technologies. Given that the zero and low NOx emission technologies needed for attainment of the ozone standard are still being developed, reliance on section 182(e)(5) measures provides flexibility and time for the development of new technology and improvement of existing technologies. South Coast AQMD measures include modest black box NOx reductions of 3 tons per day for stationary sources and 10 tons per day for mobile source incentives. However, a much larger black box is needed to accommodate

emission reductions from sources regulated by the U.S. EPA, namely aircraft, ships, and interstate trucks. The black box is needed because the U.S. EPA has not adopted aggressive controls targeting these sources. The black box includes a 70 precent emission reduction for aircraft, which is approximately 19 tons per day, and NOx reductions of 35 tons per day from other sources subject to U.S. EPA authority. Collectively, black box measures comprise 67 tons per day, or 43 percent of the emission reductions needed to reach attainment. A summary of the emission reductions is shown in Figure ES-7.

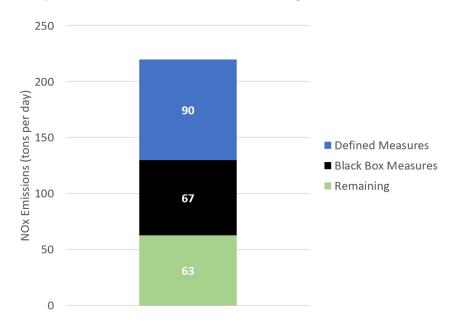


FIGURE ES-7
CONTRIBUTION OF CONTROL MEASURES TO EMISSION REDUCTIONS⁶

Attainment Demonstration

Air quality modeling is used to demonstrate future attainment of the ozone standard and is an integral part of the planning process. Modeling allows us to demonstrate the connection between emission reductions and a path to attainment. It reflects updated emissions estimates, new technical information, enhanced air quality modeling techniques, updated attainment demonstration methodology, and the control strategy.

Under baseline conditions, NOx emissions are expected to decline by nearly 36 percent from 2018 to 2037, yet air quality modeling shows that the standard would not be met. However, modeling shows that we would be expected to meet the ozone standard in 2037 with a 71 percent reduction from baseline emissions based on the controls proposed in this AQMP.

⁶ Mobile source measures reflect CARB's commitment from the 2016 and 2022 State SIP Strategies. Available online at: https://ww2.arb.ca.gov/sites/default/files/2022-01/Draft 2022 State SIP Strategy.pdf and https://ww3.arb.ca.gov/planning/sip/2016sip/rev2016statesip.pdf.



Air quality modeling indicates that the Coachella Valley will not meet the 70 ppb standard by its 2032 deadline. Therefore, the South Coast AQMD is requesting the redesignation of the Coachella Valley as an "extreme" nonattainment area, giving it a new attainment deadline of August 2038. Modeling demonstrates attainment in Coachella Valley in 2037.

Collaboration, Public Process, and Outreach

The development of the 2022 AQMP has been a regional, multi-agency effort that includes the South Coast AQMD, CARB, the Southern California Associate of Governments, and the U.S. EPA. The 2022 AQMP also incorporates collaborative efforts by a wide range of stakeholders such as businesses, environmental and health organizations, community groups, and academia. As shown in Figure ES-8, numerous meetings were conducted to promote the collaborative process and public participation. Agendas and presentations for each meeting are available at the South Coast AQMD's website.⁷

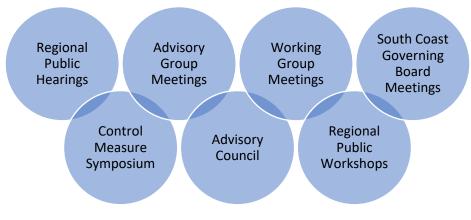


FIGURE ES-8

VENUES ACCOMMODATING STAKEHOLDER PARTICIPATION

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⁷ www.aqmd.gov/2022aqmp.