

Overview

This summary provides an overview of the proposed WAIRE Program Points system. There are additional specific provisions in Proposed Rule 2305 (PR 2305)ⁱ that may apply to some warehouses, and the specific language of the rule will always supersede anything in the brief overview presented here. In addition, the WAIRE Implementation Guidelinesⁱⁱ are available to assist warehouse operators in evaluating the details in how to comply with the WAIRE Program.

PR 2305 Applicability

Warehouse operators in buildings with greater than or equal to 100,000 square feet of floor area that may be used for warehousing activities and who operate at least 50,000 square feet of the warehouse for warehousing activities are required to earn WAIRE Points.

WAIRE Points Compliance Obligation

The number of WAIRE Points each operator would need to earn each year is based on the number of Weighted Annual Truck Trips (WATTs) to their warehouse. Truck trips are counted as one-way trips, with tractors and tractor-trailers multiplied by 2.5. The WATTs for every facility are multiplied by the stringency value in the table below to determine an operator’s WAIRE Points Compliance Obligation (WPCO) every year. An example is included below the table.

Compliance Year	WAIRE Program Stringencies for Warehouse Building Size Bins		
	≥250,000 sf	≥150,000-249,999 sf	≥100,000-149,999 sf
2022	0.000825	No WPCO	No WPCO
2023	0.001675	0.000825	No WPCO
2024	0.0025	0.001675	0.000825
2025	0.0025	0.0025	0.001675
2026 and beyond	0.0025	0.0025	0.0025

Example: In 2024, an operator in a 175,000 sf building has 30 tractors and 15 box trucks visit (one visit equals two trips) 365 days per year.

$$WATTs = (30 \times 2 \times 365 \times 2.5) + (15 \times 2 \times 365) = 65,700$$

$$Therefore, the WPCO = 65,700 \times 0.001675 = 110.0 \text{ WAIRE Points}$$

Earning WAIRE Points

WAIRE Points can be earned through: a) completing any combination of actions in the WAIRE Menu, b) completing actions in an approved Custom WAIRE Plan, or c) paying a mitigation fee.

- Points can be earned separately for *initial acquisition* of vehicles or equipment and the *ongoing usage* of that vehicle or equipment. Initial investments will continue to earn Points in future years.
- PR 2305 does not prohibit using government incentive funding to earn WAIRE Points. However, many incentive funding programs (e.g., Carl Moyer) prohibit using the funds to purchase vehicles or equipment to comply with a regulation. Importantly, the use of those incentivized vehicles or equipment is not prohibited.

Example: A warehouse operator who owns a fleet may receive Carl Moyer funds to assist in purchasing a zero emissions truck. They would not earn WAIRE Points for that purchase. However, any visits from that truck would still earn WAIRE Points.

- Points can be earned only if they go beyond requirements placed on warehouse operators from other U.S. EPA, CARB, or South Coast AQMD regulations in effect during that compliance period.

Example: CARB's Advanced Clean Trucks (ACT) regulation mandates that truck manufacturers sell increasing percentages of zero emissions trucks. ACT does not apply to warehouse operators, therefore all zero emission trucks acquired by warehouse operators and/or that visit a warehouse can earn WAIRE Points. Future regulations may have different requirements.

- Warehouse operators may apply to implement a Custom WAIRE Plan specific to their operations. The Custom WAIRE Plan can only include actions that are not already included in the WAIRE Menu. Examples include installing ZE charging infrastructure at an offsite location, using yard tractors that use near-zero engines and renewable fuels, or installing or using onsite energy generation systems (e.g., fuel cells). WAIRE Points earned from a Custom WAIRE Plan will be specific to that plan.

Transferring and Banking Points

Overcompliance in any one year allows a warehouse operator or owner to bank the extra WAIRE Points for future years, or to transfer those WAIRE Points in limited circumstances.

- Banked points can be used for up to three years after they were earned.
- Extra WAIRE Points may be transferred to any other warehouse under that operator's control during the current compliance period (no banking). Because some activities associated with WAIRE Points provide local air quality benefit, the WAIRE Points associated with some actions will be discounted if they are transferred to another warehouse.
- Extra WAIRE Points can also be transferred between a warehouse owner and operator, and vice versa. These WAIRE Points that do not leave a warehouse site may be banked for up to three years.
 - Warehouse owners may choose to earn WAIRE Points in any year, and subsequently transfer those Points to any warehouse operator that occupies the building over the next three years.

WAIRE Program User Calculator

A User Calculatorⁱⁱⁱ is available in Excel format to assist warehouse operators in calculating their WPCO and how different levels of implementation of WAIRE Menu items could be used to satisfy that obligation.

- The User Calculator calculates the WPCO based on user-inputted annual truck trips for an individual warehouse. Average truck trip rates are available if the number of annual truck trips is currently unknown, however actual data will be required for rule compliance. The WPCO is shown in cell C21.
 - The stringency of PR 2305 can be input into cell C2 using the table on the previous page.
- The level of implementation for any combination of WAIRE Menu items can be input into column H. The resulting total WAIRE Points is shown in cell I29. The number of WAIRE Points in cell I29 must be equal to or higher than the WPCO shown in cell C21 to comply with PR 2305.
 - Excess WAIRE Points can be banked for future years, or transferred, as described above.

Other WAIRE Program Components

Information about other key WAIRE Program components include reporting requirements, the WAIRE Mitigation Program, and administrative fees in PR 316 is available at www.aqmd.gov/fbmsm.

ⁱ Proposed Rule 2305: www.aqmd.gov/docs/default-source/planning/fbmsm-docs/pr-2305_4-7-21_clean.pdf

ⁱⁱ WAIRE Program Implementation Guidelines: www.aqmd.gov/docs/default-source/planning/fbmsm-docs/pr-2305_sr_2nd-draft_4-7-21_clean.pdf#page=86

ⁱⁱⁱ WAIRE Program User Calculator: