## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

# **Draft Socioeconomic Report for Adjustment Based on Consumer Price Index for Regulation III – Fees**

March 2022

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#### **EXECUTIVE SUMMARY**

Pursuant to Rule 320 and South Coast Air Quality Management District's (South Coast AQMD) statutory fee authority (See e.g., California Health & Safety Code § 40510), most fees within Regulation III will be increased by 6.5 percent, consistent with the change in the California Consumer Price Index (CPI) from December 2020 to December 2021, unless the Governing Board decides to forego the increase. The October 29, 2010 South Coast AQMD Governing Board Resolution requires an assessment of the increase in fee rates based on the previous year's CPI by March 15 of every year. A socioeconomic analysis was conducted to assess the impacts of such adjustment.

The analysis provides background information, historical revenue trends, sectoral distributions, and estimated increased fee revenue from the CPI adjustment of South Coast AQMD fees. This report considers a 6.5 percent increase in CPI applying to the fees reported collected in fiscal year (FY) 2020-2021 and calendar year 2021. A summary of the analysis and findings is presented below.

Pursuant to Rule 320, a 6.5-percent increase of most fee rates (equivalent
to the change in California CPI from December 2020 to December 2021)
will be applied effective July 1, 2022. Increases made pursuant to Rule
320 are automatic unless the Governing Board decides to forego them.
Nearly all facilities regulated by South Coast AQMD, covering most
economic sectors, would be affected by the proposed fee increases.
The analysis examines the impact of existing Regulation III fees on
various industries. The fees examined include emissions fees, permit
processing fees, annual permit renewal fees, asbestos fees, architectural
coatings fees, source testing fees, toxic hot spot fees, and a portion of fees
under Rule 2202 – On-Road Motor Vehicle Mitigation Options.
Current fee rates and the most recent equipment and activity profiles of
individual facilities were used to generate facility-level fee estimates.
These estimates were aggregated to the industry level. The manufacturing
sector is the largest contributor to South Coast AQMD's emission fees (72)
percent), permit processing fees (37 percent), and annual permit renewal
fees (41 percent). Overall, the costs of complying with current Regulation
III rates are small relative to region-wide industry output or value-added
(less than 0.01 percent).
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Based on fee categories examined in this analysis and last year's activity
levels, the CPI-based fee-rate increase of 6.5 percent is projected to bring
additional revenue totaling \$6.44 million to South Coast AQMD. The
manufacturing sector would incur the largest increase in fees
(approximately \$2.62 million for about 3,400 facilities), followed by the
services sector (approximately \$1.14 million for about 9,800 facilities) and
the retail trade sector (approximately \$0.92 million for about 4,200
facilities). Within the manufacturing sector, the petroleum and coal
products manufacturing industry, mostly comprised of refineries, would
experience an increase of approximately \$1.10 million.

#### INTRODUCTION

The South Coast AQMD General Fund consists of revenues from many sources. The majority of South Coast AQMD revenues are derived from emission fees, annual renewal fees, permit processing fees, asbestos fees, architectural coatings fees, and a portion of vehicle registration fees collected by the state (mobile sources/clean fuels). Other sources of revenues include Hearing Board fees, source test/analysis fees, transportation program (Rule 2202) fees, reimbursement for work associated with the AB 2588 program (toxic hot spot program), civil penalties/settlements, and other revenues.

Pursuant to Rule 320, most fees within Regulation III will be increased by 6.5 percent, consistent with the change in the California Consumer Price Index (CPI) from December 2020 to December 2021. This increase is being sought under the District's statutory fee authority (See e.g., California Health & Safety Code § 40510.) In addition, District Rule 320 authorizes an automatic fee increase, consistent with the CPI, unless the Governing Board decides to forego the increase. The annual increase in fee rates for the past five fiscal years (FY) and the upcoming FY are as follows: 2.5 percent in 2017-2018, 3.4 percent in 2018-2019, 3.5 percent in 2019-2020, 2.8 percent in 2020-2021, 1.7 percent in 2021-2022, and 6.5 percent in 2022-2023.

To examine the impact of a fee rate increase on various industries, this report focuses on emission fees, permit processing fees, annual permit renewal fees, toxic hot spot fees, source test fees, asbestos fees, architectural coatings fees, and a portion of Rule 2202 fees.<sup>3</sup> Other fees subject to the automatic CPI increase are area source fees and Hearing Board fees, which account for a relatively small portion of South Coast AQMD total annual revenue.

The South Coast AQMD is required to undertake socioeconomic analyses for proposed rules and rule amendments which "...will significantly affect air quality or emissions limitations..." Although the proposed CPI-based fee adjustment does not impact air quality, the South Coast AQMD Governing Board directed staff to prepare a socioeconomic analysis of the impacts of an automatic adjustment in a given year.

### REVENUE TREND

Table 1 lists historical revenue for two prior FYs, estimated revenue for the current FY 2021-2022, and projected revenue for FY 2022-2023 by major fee category. Estimated revenue for FY 2021-2022 is based on actual revenue received through February 2022. FY 2022-2023 projected revenue is based on forecasts estimated by various South Coast

<sup>&</sup>lt;sup>1</sup> A fiscal year runs from July 1 to June 30. For example, FY 2020-2021 refers to July 1, 2020 to June 30, 2021. In comparison, calendar year 2020 refers to January 1 to December 31, 2020.

<sup>&</sup>lt;sup>2</sup> Due to concerns regarding the global and financial impacts of the COVID-19 pandemic, the Board voted on May 1, 2020, for a one-time credit to fee payers encompassing the 2.8 percent increase in CPI for FY 2020-2021. Therefore, the Rule 320 report distributed March 15, 2021 considered a 4.5 percent increase in CPI, which included the 2.8 and 1.7 percent increases for FY 2020-2021 and 2021-2022 respectively.

<sup>&</sup>lt;sup>3</sup> All Rule 2202 fees are subject to annual CPI adjustment except for Air Quality Investment Program (AQIP) fees (Rule 311 (c)) and service charges for returned checks (Rule 308 (i)). AQIP fees are administered into a restricted fund and not in the South Coast AQMD general fund.

<sup>&</sup>lt;sup>4</sup> California Health and Safety Code Section 40440.8(a).

AQMD operational units. Emission fees, permit processing fees, and annual permit renewal fees together represent approximately 57 percent of South Coast AQMD's estimated total FY 2021-2022 revenues.

Compared to the estimated revenue in FY 2021-2022, a net total revenue increase of \$10.7 million is projected for FY 2022-2023. This increase reflects the impact of the CPI-based fee rate increase and changes in state funding. The increase also reflects forecasted changes in activity levels including increased source testing activities in compliance with Rule 1109.1 and anticipated increases in overall reported emissions due to economic recovery and changes in statewide emissions reporting requirements. The estimated revenue impact due to the CPI increase is estimated separately in Table 7.

FY 2019-20 FY 2020-21 FY 2021-22 FY 2022-23 **Revenue Category Changes in Revenue** Actual Actual **Estimated Projected** (from FY 2021-22 (Thousands) (Thousands) (Thousands) (Thousands) Estimated to FY 2022-23 Projected) Thousands Emissions Fees \$20,781 \$20,216 \$19,229 \$21,275 \$2,047 10.6% \$3,318 Annual Renewal Fees (w/o PERP) \$59,035 \$63,042 \$65,536 \$68,855 5.1% Permit Processing Fees \$19,667 \$16,676 \$17,761 \$17,282 -\$479 -2.7% Mobile Sources/Clean Fuels \$26,843 \$26,201 \$28,797 \$32,891 \$4,093 14.2% Sources Test & Lab Analysis \$428 \$266 \$175 \$450 \$275 157.1% \$358 \$274 \$294 \$284 -\$9 -3.2% Hearing Board Fees \$705 Transportation Program (Rule 2202) Fees \$1,070 \$896 \$955 \$58 6.5% \$60,688 \$50,550 \$45,737 \$47,172 \$1,435 3.1% Other Revenue \$188,869 \$177,929 \$178,425 \$189,163 \$10,738 6.0%

Table 1: Actual and Estimated South Coast AQMD Revenue

(Note: Numbers may not sum up due to rounding.)

#### HISTORICAL REVENUE ANALYSIS

The following sub-sections examine the distribution of revenues from various fee categories among key industries for either FY 2020-2021 or calendar year (CY) 2021 as described below. This analysis used the most recent invoiced amounts at the current fee rates to arrive at an estimated picture of the current fee revenue by industry. Thus, the figures below may differ from Table 1 as data sources may reflect different time periods.

<sup>\*</sup> Information as reported in the Comprehensive Annual Financial Reports (FYs 2019-20 & 2020-21).

<sup>\*\*</sup> Estimates are based on actual revenue received through February 2022.

<sup>\*\*\*</sup> Other Revenues include: CARB subvention fund program; state and federal grants; interest; lease income; penalties/settlements; subscriptions; AB 2588 reimbursement; miscellaneous revenues; CARB Portable Equipment Registration Program (PERP); area sources; and transfers in (from special revenue funds).

## **Annual Operating Emissions Fees**

For FY 2021-2022, emission fees account for approximately 11 percent of South Coast AQMD's estimated total revenue (Table 1). In May 2001, a flat annual operating emission fee was introduced for all facilities with at least one operating permit (Rule 301 (e)(4)). The flat annual operating emission fee implemented recommendations by the California State Auditor in 1998, the Revenue Committee established by the Executive Officer in 2000, and the independent consultant for the Fee Structure Study—Thompson, Cobb, Bazilio & Associates (March 1999).

Table 2 shows the estimated revenue collected or to be collected from around 21,000 facilities for flat annual operating emission fees (\$2.83 million) and other annual operating emission fees from around 690 facilities (\$15.80 million).<sup>6</sup> The latter category of fees contributed approximately 85 percent of total emission fees collected.<sup>7</sup> These emissions include permitted and non-permitted emissions of nitrogen oxides, sulfur oxides, volatile organic compounds, particulate matter, carbon monoxide, specific organic gasses, and toxic air contaminants for facilities required to report actual emissions each year.<sup>8</sup>

The service sector (NAICS 54-81) contributed the highest share of the flat annual operating emission fee, contributing \$0.90 million, or 32 percent, of the total amount across around 6,600 facilities. It is followed by the retail trade sector (NAICS 44-45), with \$0.50 million paid by about 3,650 facilities.

In comparison, other annual operating emission fees were mostly collected from larger businesses within certain industries. Of the approximately 690 facilities subject to annual operating emission fees, 42 percent were manufacturers (NAICS 31-33), which contributed \$11.35 million, or 72 percent, of these fees invoiced in 2021. The petroleum and coal industry (NAICS 324) contributed \$9.16 million to other annual operating emission fees, accounting for 81 percent from the manufacturing sector and 58 percent of total emissions-based fees.

## Permit Processing and Annual Permit Renewal Fees

Permit processing and annual permit renewal fees by industry are shown in Table 3. Applicants for permits to construct/operate equipment listed in Rule 301 pay a permit processing fee which varies by equipment type and size. Permit fees also include other charges based on additional time and materials billed for South Coast AQMD staff time (if specified by the applicable rule), and other fees as required (modeling, Title V fees, CEQA analysis fees, etc.). The fee, except for time and material fees, is paid at the beginning of the permit application process. Differences between permit processing fee amounts in

<sup>8</sup> Toxic air contaminants are listed in Table IV of Rule 301.

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<sup>&</sup>lt;sup>5</sup> Excluding equipment in Rule 222—Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II.

<sup>&</sup>lt;sup>6</sup> Other annual operating emission fees include non-RECLAIM emission fees (Rule 301 (e)(2)), RECLAIM emission fees (Rule 301(l)(9)), toxic air contaminant fees (Rule 301 (e)(7)), and clean fuels fees (Rule 301 (e)(6)).

<sup>&</sup>lt;sup>7</sup> Emission-based fees were derived from calendar year 2021 invoices, or the amount a facility should have paid in calendar year 2021 based on existing applicable Rule 301 fee rates.

Table 1 and Table 3 reflect application fees being collected at time of application, however, they are recognized as revenues when a majority of permit work is complete.

Table 2: Estimated Emission Fee Revenue by Industry (MM\$)

Flat Fee <sup>1</sup> Emission-based Fees <sup>2</sup>						Т.	otal		
Industry	NAICS	) O (A		# of			# of		
·		MM\$	%	Fac. <sup>3</sup>	MM\$	%	Fac.	MM\$	%
Agriculture, Forestry, Fishing & Hunting	11	\$0.01	0.43%	90	\$0.12	0.78%	17	\$0.14	0.72%
Mining	21	\$0.02	0.79%	163	\$0.52	3.29%	52	\$0.54	2.91%
Oil and Gas Extraction	211	\$0.01	0.38%	79	\$0.25	1.55%	29	\$0.26	1.37%
Mining (except oil and gas)	212-213	\$0.01	0.41%	84	\$0.27	1.74%	23	\$0.29	1.54%
Construction	23	\$0.10	3.44%	715	\$0.05	0.31%	9	\$0.15	0.79%
Manufacturing	31-33	\$0.41	14.36%	2,975	\$11.35	71.72%	291	\$11.75	63.03%
Food Manufacturing	311	\$0.02	0.88%	183	\$0.19	1.19%	22	\$0.21	1.14%
Wood Products Manufacturing	321	\$0.01	0.27%	56	\$0.01	0.04%	2	\$0.01	0.07%
Petroleum and Coal Products Mfg.	324	\$0.02	0.62%	129	\$9.16	57.90%	40	\$9.18	49.22%
Chemical Manufacturing	325	\$0.04	1.43%	298	\$0.22	1.37%	27	\$0.26	1.38%
Nonmetallic Mineral Product Mfg.	327	\$0.03	0.97%	200	\$0.31	1.93%	23	\$0.33	1.79%
Primary & Fabricated Metal Mfg.	331-332	\$0.09	3.33%	690	\$0.45	2.87%	69	\$0.55	2.94%
Machinery Manufacturing	333	\$0.02	0.73%	152	\$0.03	0.21%	3	\$0.05	0.29%
Computer and Electronic Product Mfg.	334	\$0.03	0.98%	202	\$0.05	0.30%	12	\$0.07	0.40%
Electrical Equipment & Appliance Mfg.	335	\$0.01	0.50%	104	\$0.03	0.18%	5	\$0.04	0.23%
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.02	0.88%	180	\$0.16	1.00%	24	\$0.18	0.98%
Other Manufacturing	312-339	\$0.11	3.77%	781	\$0.75	4.74%	64	\$0.86	4.59%
Utilities	22	\$0.16	5.50%	1,141	\$1.15	7.25%	75	\$1.30	6.98%
Transportation & Warehousing	48-49	\$0.08	2.74%	568	\$0.34	2.14%	23	\$0.42	2.23%
Information	51	\$0.10	3.41%	707	\$0.04	0.23%	5	\$0.13	0.71%
Publishing Industries, Except Internet	511	\$0.00	0.09%	18	\$0.00	0.00%	0	\$0.00	0.01%
Motion Picture & Sound Recording	512	\$0.01	0.34%	70	\$0.04	0.23%	5	\$0.05	0.24%
Internet Services and data processing	518,519	\$0.01	0.22%	46	\$0.00	0.00%	0	\$0.01	0.03%
Other Information	Other in 51	\$0.08	2.77%	573	\$0.00	0.00%	0	\$0.08	0.42%
Wholesale Trade	42	\$0.13	4.47%	929	\$0.33	2.07%	29	\$0.45	2.44%
Retail Trade	44-45	\$0.50	17.61%	3,650	\$0.26	1.66%	61	\$0.76	4.07%
Car & Parts Dealers	441	\$0.04	1.25%	259	\$0.00	0.02%	2	\$0.04	0.21%
Gas Stations	447	\$0.26	9.23%	1,912	\$0.12	0.78%	24	\$0.38	2.06%
Other Retail Trade	Other in 44-45	\$0.20	7.13%	1,479	\$0.14	0.86%	35	\$0.34	1.81%
Finance and Insurance	52	\$0.04	1.31%	274	\$0.00	0.00%	0	\$0.04	0.20%
Real Estate and Rental Leasing	53	\$0.13	4.76%	994	\$0.01	0.04%	2	\$0.14	0.76%
Services	54-81	\$0.90	31.84%	6,614	\$1.27	8.04%	101	\$2.17	11.65%
Professional and Technical Services	54	\$0.07	2.65%	549	\$0.05	0.30%	7	\$0.12	0.65%
Accommodation	721	\$0.03	1.11%	231	\$0.03	0.18%	1	\$0.06	0.32%
Food Services & Drinking Places	722	\$0.02	0.64%	135	\$0.00	0.01%	1	\$0.02	0.10%
Automotive Repairs & Maintenance	8111	\$0.26	9.09%	1,884	\$0.00	0.00%	1	\$0.26	1.38%
Dry Cleaning & Laundry Services	8123	\$0.11	3.87%	803	\$0.00	0.00%	0	\$0.11	0.59%
Health Care & Social Assistance	62	\$0.10	3.56%	740	\$0.29	1.83%	36	\$0.39	2.09%
Other Services	Other in 54-81	\$0.31	10.93%	2,272	\$0.91	5.72%	55	\$1.21	6.51%
Public Administration	92	\$0.23	8.03%	1,665	\$0.28	1.74%	18	\$0.50	2.70%
Unclassified <sup>4</sup>	N/A	\$0.04	1.31%	273	\$0.12	0.73%	4	\$0.15	0.82%
Totals		\$2.83	100%	20,758	\$15.82	100%	687	\$18.64	100%

<sup>&</sup>lt;sup>1</sup> Flat annual operating emission fees based on FY 2020 (07/2020-06/2021).

<sup>4</sup> Facilities with no NAICS codes assigned are categorized as "unclassified."

 $<sup>^{2}</sup>$  Other emission fees based on CY 2021 (01/2021 - 12/2021).

<sup>&</sup>lt;sup>3</sup> Almost all facilities paying emission-based fees also pay the flat fee.

Table 3 estimated a total of \$12.75 million from about 3,200 facilities that applied for permits to construct or operate, invoiced during FY 2020-2021. Facilities can apply for multiple permits. As with emission fees, most permit processing fee revenue came from the manufacturing sector, which contributed \$4.72 million, or 37 percent of permit processing fee revenue. The services sector paid the second most of permit processing fees with \$2.48 million, or 19 percent of permit processing fee revenue.

Operating permits must be renewed annually. An annual fee is assessed on the renewed permits to support continuing South Coast AQMD inspection and compliance activities and other permit related activities. As seen in Table 3, approximately 26,100 facilities held operating permits in FY 2020-2021. By March 8, 2022, these facilities are estimated to have paid \$62.16 million for FY 2020-2021. The manufacturing sector was the largest contributor paying \$25.46 million, or 41 percent of total annual permit renewal fee revenue, across about 3,400 facilities. The retail trade sector paid about \$11.56 million, or 19 percent of total annual permit renewal fee revenue, across about 4,200 facilities, while the service sector paid about \$10.27 million, or 17 percent of total annual permit renewal fee revenue, across about 9,800 facilities.

## Source Testing Fees

Revenue from source testing fees is based on invoiced source test fees during FY 2020-2021. As illustrated in Table 4, the combined source test fee revenue from Rules 304 and 304.1 was \$0.23 million. Manufacturing accounted for 48 percent of this revenue, followed by utilities with 25 percent.

## Toxic Hot Spots Fees

AB 2588 toxic hot spots fees are calculated based on health risks and priority scores. As illustrated in Table 4, the most recent invoiced revenue for FY 2020-2021 was approximately \$2.75 million. The services sector's share of this total was 30 percent, which includes automotive repairs and maintenance, dry cleaning and laundry services, health care and social assistance, etc. The second and third largest contributors to hot spot fees are retail trade and manufacturing contributing 21 and 16 percent, respectively.

Table 3: Estimated Permit Processing & Annual Renewal Fee Revenue by Industry (MM\$)

Table 3: Estimated Fermit Fr			t Processing		Annual Permit Renewal Fees <sup>2</sup>		
Industry	NAICS		1	# of			# of
		MM\$	%	Fac.	MM\$	%	Fac.
Agriculture, Forestry, Fishing & Hunting	11	\$0.03	0.23%	21	\$0.18	0.29%	119
Mining	21	\$0.25	1.98%	22	\$1.25	2.02%	251
Oil and Gas Extraction	211	\$0.16	1.27%	16	\$0.83	1.33%	146
Mining (except oil and gas)	212-213	\$0.09	0.71%	6	\$0.43	0.69%	105
Construction	23	\$0.33	2.59%	127	\$1.56	2.51%	992
Manufacturing	31-33	\$4.72	37.00%	469	\$25.46	40.95%	3,429
Food Manufacturing	311	\$0.34	2.70%	32	\$1.55	2.50%	217
Wood Products Manufacturing	321	\$0.02	0.16%	6	\$0.08	0.14%	69
Petroleum and Coal Products Mfg.	324	\$1.21	9.49%	28	\$10.57	17.01%	165
Chemical Manufacturing	325	\$0.49	3.82%	54	\$2.23	3.59%	327
Nonmetallic Mineral Product Mfg.	327	\$0.14	1.13%	23	\$1.37	2.20%	218
Primary & Fabricated Metal Mfg.	331-332	\$0.82	6.44%	110	\$4.08	6.56%	786
Machinery Manufacturing	333	\$0.05	0.42%	17	\$0.42	0.68%	175
Computer and Electronic Product Mfg.	334	\$0.31	2.46%	43	\$0.83	1.33%	224
Electrical Equipment & Appliance Mfg.	335	\$0.05	0.35%	14	\$0.53	0.85%	119
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.41	3.21%	34	\$1.11	1.79%	219
Other Manufacturing	312-339	\$0.87	6.82%	108	\$2.68	4.31%	910
Utilities	22	\$1.22	9.55%	102	\$2.72	4.37%	1,180
Transportation & Warehousing	48-49	\$0.54	4.20%	90	\$1.63	2.62%	636
Information	51	\$0.14	1.09%	79	\$0.60	0.96%	819
Publishing Industries, Except Internet	511	\$0.00	0.02%	5	\$0.03	0.05%	27
Motion Picture & Sound Recording	512	\$0.06	0.50%	21	\$0.16	0.25%	88
Internet Services and data processing	518,519	\$0.01	0.06%	10	\$0.05	0.08%	49
Other Information	Other in 51	\$0.07	0.51%	43	\$0.35	0.57%	655
Wholesale Trade	42	\$0.62	4.88%	128	\$3.17	5.09%	1,109
Retail Trade	44-45	\$1.25	9.80%	636	\$11.56	18.60%	4,214
Car & Parts Dealers	441	\$0.10	0.75%	21	\$0.29	0.46%	287
Gas Stations	447	\$0.80	6.28%	398	\$8.55	13.75%	2,159
Other Retail Trade	Other in 44-45	\$0.35	2.77%	217	\$2.73	4.39%	1,768
Finance and Insurance	52	\$0.09	0.68%	74	\$0.34	0.55%	326
Real Estate and Rental Leasing	53	\$0.25	1.99%	126	\$1.02	1.64%	1,131
Services	54-81	\$2.48	19.48%	983	\$10.27	16.52%	9,762
Professional and Technical Services	54	\$0.43	3.34%	149	\$1.47	2.36%	738
Accommodation	721	\$0.02	0.19%	24	\$0.30	0.48%	294
Food Services & Drinking Places	722	\$0.09	0.72%	58	\$0.63	1.01%	2,102
Automotive Repairs & Maintenance	8111	\$0.28	2.18%	155	\$1.70	2.74%	2,168
Dry Cleaning & Laundry Services	8123	\$0.12	0.95%	125	\$0.48	0.77%	952
Health Care & Social Assistance	62	\$0.37	2.87%	128	\$1.30	2.09%	830
Other Services	Other in 54-81	\$1.18	9.23%	344	\$4.40	7.07%	2,678
Public Administration	92	\$0.38	2.96%	135	\$1.75	2.82%	1,768
Unclassified <sup>3</sup>	N/A	\$0.45	3.55%	239	\$0.66	1.06%	367
Totals		\$12.75	100%	3,231	\$62.16	100%	26,103

 $<sup>^{\</sup>rm 1}$  Based on permit applications in FY 2020 (07/2020-06/2021).

 $<sup>^{\</sup>rm 2}$  Based on permits held in FY 2020 and paid by March 8, 2022.

<sup>&</sup>lt;sup>3</sup> Facilities with no NAICS codes assigned are categorized as "unclassified."

#### Rule 2202 Fees

Rule 2202 – On-Road Motor Vehicle Mitigation Options applies to employers with at least 250 employees in the South Coast AQMD's jurisdiction. It provides employers with three compliance options: (1) the Employee Commute Reduction Program (ECRP); (2) emission reduction strategies (ERS) such as use of clean-fuel vehicles, re-powering of diesel engine marine vessels, and vehicle scrapping; and (3) participation in the Air Quality Investment Plan (AQIP). Employers choosing the ECRP option pay a plan review fee to the South Coast AQMD when they file their ECRP Plan. Employers choosing an ERS pay a registration fee. Employers choosing to invest in AQIP pay a registration fee and an investment fee. The investment fee portion goes to a special revenue account which is not part of the General Fund.

Revenue from Rule 2202 fees herein is based on invoiced Rule 2202 fees during FY 2020-2021. A total of \$0.70 million was collected from Rule 2202 fees where services, public administration, and retail trade sectors accounted for 34, 17, and 15 percent respectively.

#### Asbestos (Rule 1403) Fees

Rule 1403 requires contractors performing renovations or demolitions to submit notifications to South Coast AQMD. During FY 2020-2021, 26,811 notifications were submitted in compliance with Rule 1403, generating around \$5.66 million in revenue. Fees are based on the size of the project, since larger projects are generally more complicated and take more time for staff to inspect. In addition, there is a flat plan review fee for approved alternative cleanup plans to address disturbed asbestos-containing materials. Finally, there are fees to revise notifications and expedite plan reviews.

#### Area Source Fees (Architectural Coatings)

Rule 314 – Fees for Architectural Coatings, adopted June 6, 2008, requires manufacturers to pay fees and report sales and emissions of architectural coatings to the South Coast AQMD. Rule 314 affects about 220 architectural coatings manufacturers classified under the chemical manufacturing sector (NAICS 325).

Fees are assessed on the manufacturers' reported annual quantity of architectural coatings and its respectively recorded cumulative VOC emissions. All fees collected from architectural coating sales in FY 2020-2021 pursuant to Rule 314 were about \$2.37 million. This amount represents around 2.4 percent of South Coast AQMD's total fee revenue for FY 2020-2021, and about 0.01 percent of the chemical manufacturing industry's economic output.<sup>9</sup>

<sup>&</sup>lt;sup>9</sup> Refer to "Major Revenue Sources by Industry" section and Table 6 for more details.

Table 4: Estimated Source Testing and Toxic Hot Spot Fees by Industry (\$MM)

		I	ce Testing F		Toxic Hot Spots Fees <sup>1</sup>			
Industry	NAICS	NAICS -						
		MM\$	%	# of Fac.	MM\$	%	# of Fac.	
Agriculture, Forestry, Fishing & Hunting	11	\$0.00	0.36%	1	\$0.01	0.24%	42	
Mining	21	\$0.01	3.72%	3	\$0.03	0.98%	54	
Oil and Gas Extraction	211	\$0.00	0.56%	1	\$0.01	0.37%	31	
Mining (except oil and gas)	212-213	\$0.01	3.16%	2	\$0.02	0.62%	23	
Construction	23	\$0.00	0.25%	1	\$0.04	1.63%	259	
Manufacturing	31-33	\$0.11	47.61%	72	\$0.44	16.13%	1,022	
Food Manufacturing	311	\$0.01	5.86%	13	\$0.01	0.20%	34	
Wood Products Manufacturing	321	\$0.00	0.25%	1	\$0.00	0.03%	6	
Petroleum and Coal Products Mfg.	324	\$0.04	16.56%	9	\$0.09	3.26%	63	
Chemical Manufacturing	325	\$0.01	4.22%	5	\$0.05	1.82%	116	
Nonmetallic Mineral Product Mfg.	327	\$0.00	0.57%	2	\$0.02	0.67%	22	
Primary & Fabricated Metal Mfg.	331-332	\$0.02	9.52%	16	\$0.13	4.60%	229	
Machinery Manufacturing	333	\$0.00	0.55%	3	\$0.01	0.35%	20	
Computer and Electronic Product Mfg.	334	\$0.00	0.18%	1	\$0.02	0.65%	109	
Electrical Equipment & Appliance Mfg.	335	\$0.00	1.96%	2	\$0.01	0.42%	24	
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.00	1.09%	5	\$0.04	1.44%	72	
Other Manufacturing	312-339	\$0.02	6.84%	15	\$0.07	2.68%	327	
Utilities	22	\$0.06	24.97%	24	\$0.17	6.23%	859	
Transportation & Warehousing	48-49	\$0.00	0.94%	2	\$0.08	2.73%	410	
Information	51	\$0.00	0.00%	0	\$0.11	3.86%	708	
Publishing Industries, Except Internet	511	\$0.00	0.00%	0	\$0.00	0.11%	19	
Motion Picture & Sound Recording	512	\$0.00	0.00%	0	\$0.02	0.58%	55	
Internet Services and data processing	518,519	\$0.00	0.00%	0	\$0.01	0.21%	42	
Other Information	Other in 51	\$0.00	0.00%	0	\$0.08	2.96%	592	
Wholesale Trade	42	\$0.01	4.27%	9	\$0.09	3.43%	519	
Retail Trade	44-45	\$0.01	3.50%	6	\$0.59	21.28%	3,239	
Car & Parts Dealers	441	\$0.00	0.00%	0	\$0.03	1.15%	181	
Gas Stations	447	\$0.00	1.07%	2	\$0.39	14.16%	2,080	
	Other in 44-							
Other Retail Trade	45	\$0.01	2.43%	4	\$0.16	5.97%	978	
Finance and Insurance	52	\$0.00	0.00%	0	\$0.04	1.36%	262	
Real Estate and Rental Leasing	53	\$0.00	0.18%	2	\$0.12	4.27%	843	
Services	54-81	\$0.02	8.45%	19	\$0.82	29.90%	4,921	
Professional and Technical Services	54	\$0.00	0.90%	3	\$0.05	1.90%	310	
Accommodation	721	\$0.00	0.00%	0	\$0.03	1.10%	218	
Food Services & Drinking Places	722	\$0.00	0.55%	3	\$0.01	0.49%	91	
Automotive Repairs & Maintenance	8111	\$0.00	0.88%	2	\$0.37	13.33%	2,009	
Dry Cleaning & Laundry Services	8123	\$0.00	0.00%	0	\$0.04	1.44%	226	
Health Care & Social Assistance	62	\$0.00	0.18%	1	\$0.11	3.86%	732	
Other Services	Other in 54- 81	\$0.01	5.94%	10	\$0.21	7.77%	1,335	
Public Administration	92	\$0.01	4.50%	5	\$0.18	6.47%	1,205	
Unclassified <sup>2</sup>	N/A	\$0.00	1.25%	3	\$0.04	1.48%	253	
Totals	,	\$0.23	100%	147	\$2.75	100%	14,596	

 $<sup>^{\</sup>rm l}$  Based on permit applications in FY 2020 (07/2020-06/2021).

 $<sup>^{\</sup>rm 2}$  Facilities with no NAICS codes as signed are categorized as "unclassified."

## Major Revenue Sources by Industry

Total fee revenue collected by South Coast AQMD for all fees reported is \$107.65 million, representing approximately 60 percent of South Coast AQMD's estimated FY 2021-2022 revenue. <sup>10,11</sup> Table 5 presents total fee revenue collected by major economic sector. These total fee revenues were estimated based on recent invoiced amounts at current fee rates. Thus, these figures may differ slightly from those in Table 1, which are based on actual revenue received.

Table 5: FY 2020-2021 Revenue from All Major Fee Categories by Sector

Sector	NAICS	Revenue from All Major Fee Categories (MM\$)	% of Total Major Fee Categories
Agriculture, Forestry, Fishing & Hunting	11	\$0.35	0.33%
Mining	21	\$2.08	1.94%
Construction	23	\$5.21	4.84%
Manufacturing	31-33	\$47.46	44.09%
Utilities	22	\$5.48	5.09%
Transportation & Warehousing	48-49	\$2.72	2.53%
Information	51	\$1.00	0.93%
Wholesale Trade	42	\$4.48	4.16%
Retail Trade	44-45	\$14.27	13.26%
Finance and Insurance	52	\$0.55	0.51%
Real Estate and Rental Leasing	53	\$1.56	1.45%
Services	54-81	\$18.21	16.92%
Public Administration	92	\$2.94	2.74%
Unclassified <sup>1</sup>	N/A	\$1.32	1.22%
Total		\$107.65	100.00%

<sup>&</sup>lt;sup>1</sup> Facilities with no NAICS codes assigned are categorized as "unclassified."

The manufacturing sector (NAICS 31-33) provides the greatest amount of fee revenue for FY 2020-2021 at about \$47.46 million, which is 44 percent of fee revenues (Figure 1). This is followed by the services sector (NAICS 54-81), providing about \$18 million, or 17 percent of fee revenues, and the retail trade sector (NAICS 44-45), providing \$14.27 million, representing a 13 percent share.

<sup>&</sup>lt;sup>10</sup> Includes fee revenue from the following sources: emission fees, permit processing fees, annual permit renewal fees (inclusive of Rule 1180 refinery fenceline and community monitoring fees), toxic hot spot fees, source test fees, a portion of Rule 2202 fees, asbestos fees, and architectural coating (Rule 314) fees.

<sup>11</sup> Estimated fee revenue collected for FY 2021-2022 is from Table 1.

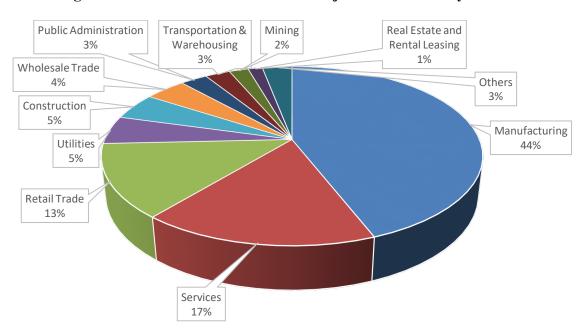


Figure 1: FY 2020-2021 Share of All Major Fee Revenue by Sector

Table 6 shows the percentage of fees from these categories relative to each industry's total (gross) output and value-added to evaluate them relative to different economic measures of industries within South Coast AQMD's jurisdiction. <sup>12</sup> Output is measured as an industry's total sales revenue. Value-added is measured as an industry's profit margin plus its expenses on labor and capital. Total fees paid is relatively small compared to each industry's regional output or value-added. This is the case for both industries which are predominantly comprised of small businesses, such as retail trade, and for industries predominately comprised of large businesses, such as refineries.

The industries which paid among the highest amount of fees relative to their output were mining (except oil and gas) (NAICS 212-213), oil and gas extraction (NAICS 211), and petroleum and coal products manufacturing (NAICS 324). The petroleum and coal products manufacturing industry paid the most, with a total of \$21.09 million, representing five hundredths of one percent of the sector's output and about a tenth of a percent of the sector's value-added. Overall, South Coast AQMD's fee revenue represented less than one-hundredth of one percent of aggregate industry output or value-added in the four-county region for each industry.

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<sup>&</sup>lt;sup>12</sup> Industry output and value-added data for 2019, the most recent historical data, was obtained from the Regional Economic Modeling, Inc. (REMI) model v2.5.0 in 2018 dollars.

Table 6: Share of Major Revenue by Detailed Industry

Industry Sector	NAICS	MM\$	% of Total Fees	% of Total Output	% of Total Value Added
Agriculture, Forestry, Fishing & Hunting	11	\$0.35	0.33%	0.010%	0.026%
Mining	21	\$2.08	1.94%	0.081%	0.160%
Oil and Gas Extraction	211	\$1.26	1.17%	0.080%	0.157%
Mining (except oil and gas)	212-213	\$0.83	0.77%	0.081%	0.165%
Construction	23	\$5.21	4.84%	0.007%	0.012%
Manufacturing	31-33	\$47.46	44.09%	0.019%	0.046%
Food Manufacturing	311	\$2.13	1.98%	0.010%	0.045%
Wood Products Manufacturing	321	\$0.12	0.11%	0.005%	0.016%
Petroleum and Coal Products Mfg.	324	\$21.09	19.59%	0.045%	0.143%
Chemical Manufacturing	325	\$7.79	7.23%	0.032%	0.073%
Nonmetallic Mineral Product Mfg.	327	\$1.87	1.73%	0.046%	0.097%
Primary & Fabricated Metal Mfg.	331-332	\$5.61	5.21%	0.022%	0.058%
Machinery Manufacturing	333	\$0.54	0.51%	0.005%	0.014%
Computer and Electronic Product Mfg.	334	\$1.25	1.16%	0.005%	0.006%
Electrical Equipment & Appliance Mfg.	335	\$0.64	0.59%	0.013%	0.025%
Motor Vehicle & Trans. Equipment Mfg.	336	\$1.76	1.63%	0.005%	0.013%
Other Manufacturing	312-339	\$6.57	6.10%	0.008%	0.020%
Utilities	22	\$5.48	5.09%	0.036%	0.057%
Transportation & Warehousing	48-49	\$2.72	2.53%	0.004%	0.007%
Information	51	\$1.00	0.93%	0.001%	0.001%
Publishing Industries, Except Internet	511	\$0.04	0.04%	0.000%	0.000%
Motion Picture & Sound Recording	512	\$0.29	0.27%	0.000%	0.001%
Internet Services and data processing	518,519	\$0.08	0.07%	0.000%	0.000%
Other Information	Other in 51	\$0.60	0.55%	0.001%	0.002%
Wholesale Trade	42	\$4.48	4.16%	0.003%	0.006%
Retail Trade	44-45	\$14.27	13.26%	0.014%	0.023%
Car & Parts Dealers	441	\$0.46	0.42%	N/A	N/A
Gas Stations	447	\$10.12	9.41%	N/A	N/A
Other Retail Trade	Other in 44-45	\$3.69	3.43%	N/A	N/A
Finance and Insurance	52	\$0.55	0.51%	0.000%	0.001%
Real Estate and Rental Leasing	53	\$1.56	1.45%	0.000%	0.001%
Services	54-81	\$18.21	16.92%	0.004%	0.006%
Professional and Technical Services	54	\$3.05	2.83%	0.002%	0.004%
Accommodation	721	\$0.43	0.40%	0.004%	0.006%
Food Services & Drinking Places	722	\$0.76	0.71%	0.001%	0.003%
Automotive Repairs & Maintenance	8111	\$0.14	0.13%	0.001%	0.002%
Dry Cleaning & Laundry Services	8123	\$0.80	0.74%	0.007%	0.010%
Health Care & Social Assistance	62	\$2.27	2.11%	0.002%	0.003%
Other Services	Other in 54-81	\$11.98	11.13%	0.007%	0.012%
Public Administration	92	\$2.94	2.74%	0.001%	0.002%
Unclassified <sup>1</sup>	N/A	\$1.32	1.22%	N/A	N/A
Total		\$107.65	100%	0.005%	0.009%

<sup>&</sup>lt;sup>1</sup> Facilities with no NAICS codes assigned are categorized as "unclassified."

<sup>\*</sup>N/A values exist due to lack of output and value added information from REMI model.

# REVENUE IMPACTS OF PROPOSED FEE RATE INCREASE BY INDUSTRY

Rule 320 requires annual adjustment of most fee rates in Regulation III by an amount equal to the change in CPI, unless the Board decides to forgo the CPI increase. For the period of December 2020 to December 2021 the CPI increase was a rate of 6.5 percent.

To analyze the impact of the CPI-based increase alone, we base the estimate on FY 2020-2021 emissions and the current equipment and activity profile of individual facilities. This estimate therefore excludes any other changes to revenue, such as changes in state funding and activity levels, as discussed in the Revenue Trend section. Based on this methodology, the fee rate increases from the 6.5 percent CPI increase are estimated to increase total South Coast AQMD revenue by approximately \$6.44 million. This estimate is only for the CPI-based increase and differs from the estimate in Table 1 for reasons discussed above.

Table 7 shows the distribution of the fee changes across the affected industries. The manufacturing sector would experience the largest increase in fees (approximately \$2.63 million for about 3,400 facilities), followed by the services sector (approximately \$1.14 million for about 9,800 facilities), the retail trade sector (approximately \$0.92 million for about 4,200 facilities), with the remaining sectors accounting for approximately \$1.75 million. Within the manufacturing sector, the petroleum and coal products manufacturing industry, mostly comprised of refineries, will have an increase of around \$1.10 million, or about 17 percent of the overall increase.

#### **SUMMARY**

The above analysis provides background information on South Coast AQMD's revenue and summarizes the economic impact on facilities regulated by South Coast AQMD due to the automatic consumer price index (Rule 320) increase. Based on the fee categories examined in the analysis and last year's activity levels, South Coast AQMD revenues are expected to increase by \$6.44 million due to this fee rate increase. However, the amount of South Coast AQMD fees paid by each industry remained small relative to the industry's economic output or value-added (less than 0.01 percent overall).

**March 2022** 

Table 7: Revenue Impact of the Fee Rate Increase by Industry Sector

Table 7: Revenue Impact o				l
Industry	NAICS	Estimated Number of Facilities	Revenue Change Due to 6.5% CPI	Percent of Total CPI Increase
		Affected	Adjustment	
Agriculture, Forestry, Fishing & Hunting	111-115	119	\$19,662	0.31%
Mining	21	251	\$128,760	2.00%
Oil and Gas Extraction	211	146	\$78,131	1.21%
Mining (except oil and gas)	212-213	105	\$50,630	0.79%
Construction	23	992	\$337,288	5.24%
Manufacturing	31-33	3,429	\$2,625,418	40.75%
Food Manufacturing	311	217	\$134,192	2.08%
Wood Products Manufacturing	321	69	\$7,731	0.12%
Petroleum and Coal Products Mfg.	324	165	\$1,095,729	17.01%
Chemical Manufacturing	325	327	\$349,707	5.43%
Nonmetallic Mineral Product Mfg.	327	218	\$115,558	1.79%
Primary & Fabricated Metal Mfg.	331-332	786	\$356,436	5.53%
Machinery Manufacturing	333	175	\$34,392	0.53%
Computer and Electronic Product Mfg.	334	224	\$79,735	1.24%
Electrical Equipment & Appliance Mfg.	335	119	\$40,252	0.62%
Motor Vehicle & Trans. Equipment Mfg.	336	219	\$110,472	1.71%
Other Manufacturing	312-339	910	\$301,215	4.68%
Utilities	22	1,180	\$340,430	5.28%
Transportation & Warehousing	48-49	636	\$165,700	2.57%
Information	51	819	\$62,797	0.97%
Publishing Industries, Except Internet	511	27	\$2,784	0.04%
Motion Picture & Sound Recording	512	88	\$16,518	0.26%
Internet Services and data processing	518,519	49	\$5,022	0.08%
Other Information	Other in 51	655	\$38,474	0.60%
Wholesale Trade	42	1,109	\$286,292	4.44%
Retail Trade	44-45	4,214	\$921,950	14.31%
Car & Parts Dealers	441	287	\$29,490	0.46%
Gas Stations	447	2,159	\$655,359	10.17%
Other Retail Trade	Other in 44-45	1,768	\$237,101	3.68%
Finance and Insurance	52	326	\$35,476	0.55%
Real Estate and Rental Leasing	53	1,131	\$101,336	1.57%
Services	54-81	9,762	\$1,144,643	17.77%
Professional and Technical Services	54	738	\$196,110	3.04%
Accommodation	721	294	\$27,388	0.43%
Food Services & Drinking Places	722	2,102	\$49,326	0.77%
Automotive Repairs & Maintenance	8111	2,168	\$170,589	2.65%
Dry Cleaning & Laundry Services	8123	952	\$48,590	0.75%
Health Care & Social Assistance	62	830	\$135,926	2.11%
Other Services	Other in 54-81	2,678	\$516,715	8.02%
Public Administration	92	1,768	\$186,649	2.90%
Unclassified <sup>1</sup>	N/A	367	\$85,921	1.33%
Totals		26,103	\$6,442,323	100%

 $<sup>^{\</sup>rm 1}$  Facilities with no NAICS codes assigned are categorized as "unclassified."

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