SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Draft Socioeconomic Assessment for Rule 320 -Automatic Adjustment Based on Consumer Price Index for Regulation III Fees

March 2018

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EXECUTIVE SUMMARY

Rule 320 – Automatic Adjustment Based on Consumer Price Index (CPI) for Regulation III Fees requires adjustments of most fee rates in Regulation III by the California CPI annually unless the Governing Board votes to amend the rule to not require the CPI increase or requires a different increase for a given year. The October 29, 2010 SCAQMD Governing Board Resolution requires, by March 15, an assessment of the increase in fee rates based on the previous year's CPI. A socioeconomic analysis was conducted to assess the impacts of such adjustment. In addition, the analysis provides background information, historical trends of SCAQMD revenues from various fees and sectoral distributions of these fees. A summary of the analysis and findings is presented below.

Fee	Pursuant to Rule 320, an across-the-board 3.4-percent increase in fee rates
Increases	(equivalent to the change in the California CPI from December 2016 to
	December 2017) will occur on July 1, 2018 unless the Governing Board
	decides to forego the 3.4-percent increase.
Affected	Nearly all the facilities regulated by the SCAQMD would be affected by
Facilities	the proposed fee increases. These facilities belong to every sector of the
	economy.
Approach	The analysis herein initially examines the impact of the existing
and	Regulation III fees on various industries. The fees examined include
Findings	emissions fees, permit processing fees, annual permit renewal fees, toxic
	hot spot fees, source testing fees, and a portion of fees under Rule 2202 –
	On-Road Motor Vehicle Mitigation Options. The current fee rates together
	with the most recent equipment and activity profiles of individual facilities
	were used to generate facility level fee estimates. These estimates were
	then aggregated to the industry level.
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	The manufacturing sector is the largest contributor to SCAQMD's
	emission fees (68 percent), permit processing fees (41 percent), and annual
	permit renewal fees (36 percent). Overall, the costs of complying with the
	current Regulation III rates are very small relative to the region-wide
	industry output or value-added (less than 0.01 percent).
	Based on the fee categories examined in the analysis and last year's
Impact of	activity levels, the across-the-board CPI-based fee rate increase <i>per se</i> is
Fee	projected to bring additional revenue totaling \$2.74 million to SCAQMD.
Increase	The manufacturing sector as a whole would incur the largest increase in
IIICI Casc	fees (approximately \$1.20 million for about 3,700 facilities), followed by
	the services sector (approximately \$0.49 million for about 10,600
	facilities) and the retail trade sector (approximately \$0.49 million for about 10,000 facilities) and the retail trade sector (approximately \$0.37 million for about
	4,000 facilities). Within the manufacturing sector, the petroleum and coal
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	products manufacturing industry, mostly comprised of refineries, will
	experience an increase of approximately \$0.51 million.

¹ Proposed amendments to Regulation III with fee impacts will be analyzed in a separate socioeconomic report.

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INTRODUCTION

The SCAQMD General Fund is comprised of revenues from a number of sources. The majority of SCAQMD revenues are derived from emission fees, annual renewal fees, permit processing 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, an across-the-board 3.4-percent increase in fee rates (equivalent to the change in the California Consumer Price Index from December 2016 to December 2017) will occur on July 1, 2018 unless the Governing Board decides to forego the 3.4-percent increase. For the past five fiscal years² (FY), the annual increase in fee rates mirroring the CPI were as follows: 2.0% in 2013-2014, 1.6% in 2014-2015, 1.4% in 2015-2016, 2.4% in 2016-17, and 2.5% in 2017-2018.

In order to examine the impact of a fee rate increase on various industry sectors, this report focuses the analysis on emission fees, permit processing fees, annual permit renewal fees, toxic hot spot fees, source test fees, and a portion of Rule 2202 fees.³ Other fees that are also subject to the automatic CPI increase are area source fees and Hearing Board fees; however, they account for a relatively small portion of the total revenue.

The SCAQMD is required to undertake socioeconomic analyses by California Health and Safety Code (H&SC) Section 40440.8(a) for proposed rules and rule amendments that "will significantly affect air quality or emissions limitations". Although the proposed CPI-based fee adjustment does not satisfy this criterion, the analysis herein is presented per the October 29, 2010 Special Governing Board Resolution related to Rule 320, which permits the Governing Board to direct 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 2017-2018, and projected revenue for FY 2018-2019 by major fee category. Estimated revenue for FY 2017-2018 is based on actual revenue received through February 2018. FY 2018-2019 projected revenue is based on forecasts estimated by various SCAQMD operational units. Emission fees, permit processing fees, and annual permit renewal fees together represent approximately 60 percent of SCAQMD's estimated total FY 2017-2018 revenues.

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² A fiscal year runs from July 1 to June 30. For example, FY 2017-2018 refers to the period of July 1, 2017 to June 30, 2018. In comparison, calendar year (CY) 2017 refers to the period of January 1 to December 31, 2017.

³ Employers that are subject to Rule 2202 can choose among various compliance options, including participation in the Air Quality Investment Program (AQIP). The AQIP program fees consist of a registration fee and an investment fee, the latter of which goes to a special revenue account to obtain necessary emissions reduction or air quality benefits and is not part of the General Fund.

Compared to the estimated revenue in FY 2017-2018, a net total revenue increase of \$12.1 million is projected for FY 2018-2019, which reflects the impact of the across-the-board CPI-based fee rate increase, a 2017 Board-approved Title V/Non-Title V fee increase, additional state funding, and the forecasted changes in activity levels. This estimated revenue increase is inclusive of the CPI-based fee rate increase, the impact of which is also estimated separately in Table 6.

Table 1: Actual and Estimated SCAQMD Revenue

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Revenue Category	FY 2015- 2016 Actual* (Thousands)	FY 2016- 2017 Actual*	FY 2017- 2018 Estimated**	FY 2018- 2019 Projected	Changes in 1 (from FY 20 Estimat	17-2018	
	(Thousands)	(Thousands)	(Thousands)	(Thousands)	Thousands	%	
Emission Fees	\$18,985	\$18,964	\$19,827	\$19,729	-\$98	-0.5%	
Annual Renewal Fees (w/o PERP)	\$46,380	\$47,561	\$51,395	\$57,271	\$5,876	11.4%	
Permit Processing Fees	\$17,240	\$20,729	\$18,051	\$19,156	\$1,104	6.1%	
Mobile Sources/Clean Fuels	\$21,968	\$23,793	\$26,177	\$30,596	\$4,419	16.9%	
Sources Test & Lab Analysis	\$683	\$734	\$756	\$782	\$26	3.4%	
Hearing Board Fees	\$164	\$188	\$317	\$259	-\$58	-18.4%	
Transportation Program (Rule 2202) Fees	\$892	\$840	\$920	\$951	\$31	3.4%	
Other Revenue***	\$28,093	\$36,083	\$30,401	\$31,156	\$755	2.5%	
Total	\$134,405	\$148,893	\$147,844	\$159,899	\$12,055	8.2%	

(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 16-17 or CY 2017 as described below. It should be noted that this analysis has 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 slightly from Table 1 because data sources may reflect different time periods.

Emission Fees

For FY 17-18 emission fees account for approximately 13 percent of SCAQMD's estimated total revenue (Table 1). In May 2001, a flat emissions fee was introduced for all facilities with at least one operating permit.⁴ The flat fee implemented recommendations by the California State Auditor in 1998, the Revenue Committee established by the

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^{*} Information as reported in the Comprehensive Annual Financial Reports (FYs 2015-16 & 2016-17).

^{**} Estimates are based on actual revenue received through February 2018.

^{***} Other Revenues include: CARB Subvention; State and Federal Grants; Interest; Lease Income; Penalties/Settlements; Subscriptions; AB 2588 Reimbursement; Miscellaneous Revenues; Portable Equipment Registration Program (PERP); Area Sources; and Transfers In (from special revenue funds).

⁴ Excluding equipment in Rule 222—Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II.

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 more than 21,000 facilities for flat emission fees (\$2.66 million) and emissions-based fees (\$15.16 million), the latter of which contributed approximately 85 percent of total emission fees collected.⁵ These emissions include permitted and non-permitted emissions of NOx, SOx, VOC, TSP, CO, and specific organic gasses (SPOG) as well as toxic air contaminants⁶ for facilities required to report their actual emissions each year. Also included were clean fuels fees for stationary sources.

The services sector (NAICS 54-81) that is made of almost 7,000 facilities contributed the highest share of the flat emission fee, contributing \$0.87 million or 33 percent of the total amount. It is followed by the retail trade sector (NAICS 44-45), with \$0.45 million paid by about 3,600 facilities. In comparison, emission-based fees were mostly collected from larger-sized businesses located within certain industry sectors. Among the 927 facilities that were subject to emission-based fees, nearly half were manufacturers (NAICS 31-33), and they contributed 78 percent of the total emission-based fees invoiced in 2017. The petroleum and coal industry (NAICS 324) alone contributed \$9.60 million to emissions-based fees, accounting for 82 percent of the manufacturing sector and 63 percent of total emissions-based fees.

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⁵ Emission-based fees were derived from 2017 emissions and the invoiced amount, or the amount a facility should have paid, in Calendar Year 2017 based on the existing Rule 301 fee rates.

⁶ Listed in Table IV of Rule 301.

Table 2: Estimated Emission Fee Revenue by Industry in 2017 (MM\$)

Table 2. Estimate	Limssion F	Flat Fee*				sion-based		To	otal
			<u> </u>	# of		<u> </u>	# of		
Industry	NAICS	MM\$	%	Fac.**	MM\$	%	Fac.**	MM\$	%
Agriculture, Forestry, Fishing & Hunting	11	\$0.01	0.38%	81	\$0.13	0.89%	35	\$0.14	0.81%
Mining	21	\$0.03	1.16%	245	\$0.44	2.88%	72	\$0.47	2.63%
Oil and Gas Extraction	211	\$0.02	0.73%	154	\$0.21	1.39%	47	\$0.23	1.29%
Mining (except oil and gas)	212-213	\$0.01	0.43%	91	\$0.23	1.49%	25	\$0.24	1.34%
Construction	23	\$0.09	3.53%	749	\$0.04	0.27%	9	\$0.13	0.75%
Manufacturing	31-33	\$0.41	15.26%	3,240	\$11.76	77.59%	414	\$12.17	68.29%
Food Manufacturing	311	\$0.02	0.88%	187	\$0.09	0.60%	38	\$0.11	0.64%
Wood Products Manufacturing	321	\$0.01	0.32%	67	\$0.01	0.04%	4	\$0.01	0.08%
Petroleum and Coal Products Mfg.	324	\$0.01	0.42%	90	\$9.59	63.25%	39	\$9.60	53.88%
Chemical Manufacturing	325	\$0.04	1.45%	308	\$0.26	1.69%	45	\$0.30	1.66%
Nonmetallic Mineral Product Mfg.	327	\$0.03	1.03%	219	\$0.47	3.11%	24	\$0.50	2.80%
Primary & Fabricated Metal Mfg.	331-332	\$0.10	3.59%	764	\$0.41	2.68%	95	\$0.50	2.82%
Machinery Manufacturing	333	\$0.02	0.78%	166	\$0.03	0.18%	5	\$0.05	0.27%
Computer and Electronic Product Mfg.	334	\$0.03	1.12%	238	\$0.03	0.21%	18	\$0.06	0.34%
Electrical Equipment & Appliance Mfg.	335	\$0.01	0.51%	109	\$0.01	0.09%	10	\$0.03	0.15%
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.03	0.99%	211	\$0.09	0.61%	28	\$0.12	0.66%
Other Manufacturing	312-339	\$0.11	4.16%	881	\$0.78	5.14%	108	\$0.89	4.99%
Utilities	22	\$0.13	4.76%	1,010	\$0.98	6.43%	79	\$1.10	6.18%
Transportation & Warehousing	48-49	\$0.07	2.55%	542	\$0.37	2.41%	30	\$0.43	2.43%
Information	51	\$0.08	3.15%	671	\$0.02	0.11%	6	\$0.10	0.57%
Publishing Industries, Except Internet	511	\$0.00	0.11%	23	\$0.00	0.01%	1	\$0.00	0.03%
Motion Picture & Sound Recording	512	\$0.01	0.29%	62	\$0.02	0.10%	5	\$0.02	0.13%
Internet Services and data processing	518, 519	\$0.01	0.25%	52	\$0.00	0.00%	0	\$0.01	0.04%
Other Information	Other in 51	\$0.07	2.51%	534	\$0.00	0.00%	0	\$0.07	0.37%
Wholesale Trade	42	\$0.13	4.84%	1,027	\$0.25	1.63%	48	\$0.38	2.11%
Retail Trade	44-45	\$0.45	16.95%	3,589	\$0.22	1.42%	70	\$0.67	3.74%
Car & Parts Dealers	441	\$0.03	1.28%	271	\$0.00	0.02%	4	\$0.04	0.20%
Gas Stations	447	\$0.21	8.08%	1,708	\$0.07	0.48%	15	\$0.29	1.62%
Other Retail Trade	Other in 44-45	\$0.20	7.59%	1,610	\$0.14	0.92%	51	\$0.34	1.92%
Finance and Insurance	52	\$0.04	1.39%	296	\$0.00	0.01%	2	\$0.04	0.21%
Real Estate and Rental Leasing	53	\$0.13	4.82%	1,025	\$0.00	0.02%	3	\$0.13	0.74%
Services	54-81	\$0.87	32.91%	6,987	\$0.81	5.34%	138	\$1.68	9.45%
Professional and Technical Services	54	\$0.07	2.58%	547	\$0.01	0.03%	12	\$0.07	0.41%
Accommodation	721	\$0.03	1.00%	211	\$0.00	0.00%	0	\$0.03	0.15%
Food Services & Drinking Places	722	\$0.02	0.64%	137	\$0.00	0.01%	3	\$0.02	0.10%
Automotive Repairs & Maintenance	8111	\$0.24	9.12%	1,935	\$0.01	0.08%	4	\$0.25	1.42%
Dry Cleaning & Laundry Services	8123	\$0.13	4.98%	1,054	\$0.00	0.00%	3	\$0.13	0.74%
Health Care & Social Assistance	62	\$0.09	3.55%	754	\$0.11	0.72%	46	\$0.20	1.14%
Other Services	Other in 54-81	\$0.29	11.05%	2,349	\$0.68	4.50%	70	\$0.98	5.48%
Public Administration	92	\$0.18	6.87%	1,456	\$0.13	0.83%	17	\$0.31	1.73%
Unclassified***	N/A	\$0.04	1.43%	304	\$0.02	0.16%	4	\$0.06	0.35%
Totals		\$2.66	100%	21,222	\$15.16	100%	927	\$17.82	100%

^{*} Flat emission fees based on FY 16-17.

** Almost all facilities paying emission-based fees also pay the flat fee.

*** Facilities with no NAICS codes assigned are categorized as "unclassified."

Permit Processing Fees 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 SCAQMD 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. Variances in permit processing fee amounts between Table 3 - Estimated Permit Processing & Annual Permit Renewal Fee Revenue by Industry and Table 1 – Actual and Estimated SCAQMD Revenue reflect the fact that application fees are collected at time of application, but are recognized as revenues at the time the majority of permit work is completed.

As Table 3 indicates, an estimated total of \$12.29 million from about 4,300 facilities that applied for permits to construct or operate was invoiced during FY 2016-2017. It should be noted that a facility could apply for multiple permits. As with emission fees, the majority of the permit processing fee revenue came from the manufacturing sector. It contributed \$5.00 million, or 41 percent, of the total revenue in this fee category, followed by the services sector with \$2.46 million (20 percent).

Operating permits must be renewed annually. An annual fee is assessed on the renewed permits to support continuing SCAQMD inspection and compliance activities and other permit related activities. Approximately 27,000 facilities held operating permits as of March 6, 2017. The revenue from these facilities at the current fee rate is estimated to be \$47.54 million (Table 3). The manufacturing sector, with nearly 4,000 facilities, was the largest contributor, paying \$17.25 million or 36 percent of the total annual renewal fee revenue. The service sector with more than 10,000 facilities paid about \$9.20 million and the retail trade sector with about 4,000 facilities paid about \$8 million.

Area Source Fees (Architectural Coatings)

Rule 314 – Fees for Architectural Coatings, was adopted on June 6, 2008 requiring manufacturers to pay fees, as well as report sales and emissions of architectural coatings to the SCAQMD. The rule affects about 200 architectural coatings manufacturers. Beginning in 2009 and each subsequent calendar year, Rule 314 requires architectural coatings manufacturers to report to SCAQMD the total annual quantity (in gallons) and emissions of each of their architectural products distributed or sold into or within the SCAQMD for use in the SCAQMD during the previous calendar year. Fees are assessed on the manufacturers' reported annual quantity of architectural coatings as well as the cumulative VOC emissions from the reported annual quantity of coatings. All fees collected from architectural coating sales in FY 2016-2017 pursuant to Rule 314 were about \$2.1 million which is around 1.4 percent of the SCAQMD's total revenue for that FY. These fees are collected from paint manufacturers who are classified under the chemical manufacturing sector (NAICS 325). The \$2.1 million in fees collected from architectural coatings represent about 0.01 percent of the chemical manufacturing industry's economic output.⁷

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⁷ Please refer to the "Major Revenue Sources by Industry" section for more details.

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

	by Indus	_ ``		Food	Annual	Permit Renev	ual Eags ²
Industry	NAICS	Periii	t Processing	# of	Aimuai	Fernini Kenev	
Industry	NAICS	MM\$	%		ммф	%	# of Fac.
Agriculture Forester Fishing & Hunting	11	\$0.05	0.43%	Fac.	MM\$ \$0.14	0.29%	114
Agriculture, Forestry, Fishing & Hunting	11 21	· ·	1.88%	20			
Mining		\$0.23		63	\$1.38 \$0.99	2.90%	340
Oil and Gas Extraction	211	\$0.10	0.82%	34		2.09%	223
Mining (except oil and gas)	212-213	\$0.13	1.06%	29	\$0.39	0.82%	117
Construction	23	\$0.49	4.00%	202	\$1.33	2.79%	1,072
Manufacturing	31-33	\$5.00	40.67%	696	\$17.25	36.29%	3,715
Food Manufacturing	311	\$0.35	2.88%	61	\$1.37	2.87%	231
Wood Products Manufacturing	321	\$0.01	0.05%	5	\$0.08	0.16%	82
Petroleum and Coal Products Mfg.	324	\$0.89	7.25%	37	\$4.36	9.17%	98
Chemical Manufacturing	325	\$0.44	3.58%	85	\$1.94	4.07%	352
Nonmetallic Mineral Product Mfg.	327	\$0.18	1.48%	28	\$1.21	2.55%	234
Primary & Fabricated Metal Mfg.	331-332	\$1.41	11.49%	166	\$3.44	7.23%	846
Machinery Manufacturing	333	\$0.18	1.47%	32	\$0.38	0.80%	204
Computer and Electronic Product Mfg.	334	\$0.18	1.46%	55	\$0.73	1.53%	275
Electrical Equipment & Appliance Mfg.	335	\$0.13	1.04%	23	\$0.43	0.90%	124
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.48	3.94%	48	\$0.89	1.88%	241
Other Manufacturing	312-339	\$0.74	6.03%	156	\$2.44	5.12%	1,028
Utilities	22	\$1.04	8.45%	114	\$2.16	4.54%	1,042
Transportation & Warehousing	48-49	\$0.43	3.49%	97	\$1.32	2.78%	632
Information	51	\$0.17	1.38%	86	\$0.50	1.06%	747
Publishing Industries, Except Internet	511	\$0.05	0.39%	9	\$0.05	0.10%	34
Motion Picture & Sound Recording	512	\$0.03	0.28%	16	\$0.13	0.28%	76
Internet Services and data processing	518,519	\$0.01	0.06%	16	\$0.05	0.10%	55
Other Information	Other in 51	\$0.08	0.65%	45	\$0.27	0.58%	582
Wholesale Trade	42	\$0.44	3.58%	169	\$2.70	5.67%	1,205
Retail Trade	44-45	\$1.20	9.73%	882	\$8.62	18.13%	3,979
Car & Parts Dealers	441	\$0.09	0.74%	38	\$0.23	0.49%	302
Gas Stations	447	\$0.52	4.19%	272	\$5.86	12.32%	1,821
Other Retail Trade	Other in 44-45	\$0.59	4.80%	572	\$2.53	5.32%	1,856
Finance and Insurance	52	\$0.09	0.75%	67	\$0.32	0.67%	356
Real Estate and Rental Leasing	53	\$0.28	2.25%	160	\$0.96	2.02%	1,170
Services	54-81	\$2.46	20.06%	1,444	\$9.20	19.34%	10,634
Professional and Technical Services	54	\$0.48	3.93%	178	\$1.14	2.41%	793
Accommodation	721	\$0.06	0.46%	51	\$0.22	0.46%	272
Food Services & Drinking Places	722	\$0.10	0.82%	134	\$0.64	1.35%	2,378
Automotive Repairs & Maintenance	8111	\$0.38	3.11%	230	\$1.65	3.48%	2,271
Dry Cleaning & Laundry Services	8123	\$0.08	0.68%	114	\$0.54	1.14%	1,239
Health Care & Social Assistance	62	\$0.25	2.05%	145	\$1.12	2.35%	830
Other Services	Other in 54-81	\$1.11	9.01%	592	\$3.88	8.16%	2,851
Public Administration	92	\$0.28	2.31%	156	\$1.11	2.34%	1,529
Unclassified*	N/A	\$0.13	1.04%	102	\$0.56	1.17%	398
Totals	11/71	\$12.29	100%	4,258	\$47.54	100%	26,933
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¹ Based on permit applications in FY 2016-2017.

Toxic Hot Spots Fees

AB 2588 toxic hot spots fees are calculated based on health risks and priority scores. The most recent invoiced revenue for FY 2016-2017 was approximately \$1.67 million (Table

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² Based on permits held on March 6, 2018.

^{*} Facilities with no NAICS codes assigned are categorized as "unclassified."

4). The services sector's share of this total was 35 percent, followed by manufacturing (30 percent) and retail trade (21 percent).

Source Testing Fees

The revenue from source testing fees is based on the invoiced source test fees during FY 2016-2017. During this period of time, the source test fee revenue from Rules 304 and 304.1 was \$0.53 million (Table 4). The manufacturing sector accounted for 56 percent of this revenue, followed by services (17 percent).

Rule 2202 Fees

Rule 2202 – On-Road Motor Vehicle Mitigation Options applies to employers with 250 or more employees in the SCAQMD's jurisdiction. It provides employers with three compliance options: (1) the Employee Commute Reduction Program (ECRP); (2) emission reduction strategies (ERS) such as the use of clean fuel vehicles, re-powering of diesel engine marine vessels, and vehicle scrapping; and (3) the AQIP. Employers choosing the ECRP option pay a plan review fee to the SCAQMD at the time 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.

The revenue from Rule 2202 fees herein is based on the invoiced Rule 2202 fees during FY 2016-2017. A total of \$0.83 million was collected from Rule 2202 fees for ECRP, ERS, and AQIP registration fees. The services sector accounted for approximately 35 percent of the estimated Rule 2202 fee revenue. Unlike many of the other fee categories, only 14 percent of the revenue came from the manufacturing sector.

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

		C	T4: D		Toxic Hot Spots Foos			
I., J.,	NATOR	Source Testing Fees # of			Toxic Hot Spots Fees			
Industry	NAICS	MM\$	%	Fac.	MM\$	%	# of Fac.	
Agriculture, Forestry, Fishing & Hunting	11	\$0.00	0.26%	2	\$0.00	0.00%	0	
Mining	21	\$0.00	2.12%		\$0.00	0.46%	72	
Oil and Gas Extraction	211	\$0.01		11 9		0.40%	47	
			1.83%	2	\$0.01			
Mining (except oil and gas)	212-213	\$0.00	0.30%		\$0.00	0.09%	25	
Construction	23	\$0.01	1.25%	8	\$0.03	1.65%	9	
Manufacturing	31-33	\$0.30	56.47%	192	\$0.49	29.56%	414	
Food Manufacturing	311	\$0.03	5.20%	20	\$0.00	0.08%	38	
Wood Products Manufacturing	321	\$0.00	0.00%	0	\$0.00	0.04%	4	
Petroleum and Coal Products Mfg.	324	\$0.05	10.22%	17	\$0.07	4.47%	39	
Chemical Manufacturing	325	\$0.01	2.71%	14	\$0.02	1.39%	45	
Nonmetallic Mineral Product Mfg.	327	\$0.00	0.54%	5	\$0.01	0.30%	24	
Primary & Fabricated Metal Mfg.	331-332	\$0.12	22.72%	67	\$0.21	12.61%	95	
Machinery Manufacturing	333	\$0.02	3.01%	8	\$0.02	1.18%	5	
Computer and Electronic Product Mfg.	334	\$0.00	0.46%	3	\$0.02	0.94%	18	
Electrical Equipment & Appliance Mfg.	335	\$0.01	2.14%	6	\$0.02	1.25%	10	
Motor Vehicle & Trans. Equipment Mfg.	336	\$0.02	3.88%	19	\$0.04	2.57%	28	
Other Manufacturing	312-339	\$0.03	5.58%	33	\$0.08	4.74%	108	
Utilities	22	\$0.07	12.78%	32	\$0.05	3.04%	79	
Transportation & Warehousing	48-49	\$0.01	1.75%	6	\$0.02	1.09%	30	
Information	51	\$0.00	0.21%	2	\$0.01	0.42%	6	
Publishing Industries, Except Internet	511	\$0.00	0.00%	0	\$0.00	0.11%	1	
Motion Picture & Sound Recording	512	\$0.00	0.00%	0	\$0.00	0.22%	5	
Internet Services and data processing	518,519	\$0.00	0.21%	2	\$0.00	0.03%	0	
Other Information	Other in 51	\$0.00	0.00%	0	\$0.00	0.06%	0	
Wholesale Trade	42	\$0.02	3.62%	16	\$0.07	3.97%	48	
Retail Trade	44-45	\$0.01	1.67%	9	\$0.35	21.10%	70	
Car & Parts Dealers	441	\$0.00	0.33%	2	\$0.03	1.79%	4	
Gas Stations	447	\$0.00	0.86%	3	\$0.23	13.96%	15	
Other Retail Trade	Other in 44-45	\$0.00	0.47%	4	\$0.09	5.34%	51	
Finance and Insurance	52	\$0.00	0.09%	1	\$0.01	0.39%	2	
Real Estate and Rental Leasing	53	\$0.01	0.97%	4	\$0.02	1.02%	3	
Services	54-81	\$0.09	16.80%	60	\$0.58	34.55%	138	
Professional and Technical Services	54	\$0.02	3.72%	11	\$0.02	1.09%	12	
Accommodation	721	\$0.00	0.17%	1	\$0.00	0.06%	0	
Food Services & Drinking Places	722	\$0.00	0.23%	2	\$0.00	0.23%	3	
Automotive Repairs & Maintenance	8111	\$0.01	0.98%	7	\$0.37	22.38%	4	
Dry Cleaning & Laundry Services	8123	\$0.00	0.93%	3	\$0.10	6.14%	3	
Health Care & Social Assistance	62	\$0.02	4.04%	10	\$0.01	0.40%	46	
Other Services	Other in 54-81	\$0.04	6.75%	26	\$0.07	4.24%	70	
Public Administration	92	\$0.00	0.69%	5	\$0.00	0.24%	17	
	N/A	\$0.01	1.30%	4	\$0.04	2.51%	4	
Unclassified*								

^{*} Facilities with no NAICS codes assigned are categorized as "unclassified."

Major Revenue Sources by Industry

Approximately 61 percent of the SCAQMD's FY 2017-2018 estimated revenue comes from the following major revenue categories: emission fees, permit processing fees, annual permit renewal fees, toxic hot spot fees, source test fees, and a portion of Rule 2202 fees. The amount of these total fee revenues incurred by the major economic sectors is shown in Table 5. These total fee revenues were estimated based on recent invoiced amounts at

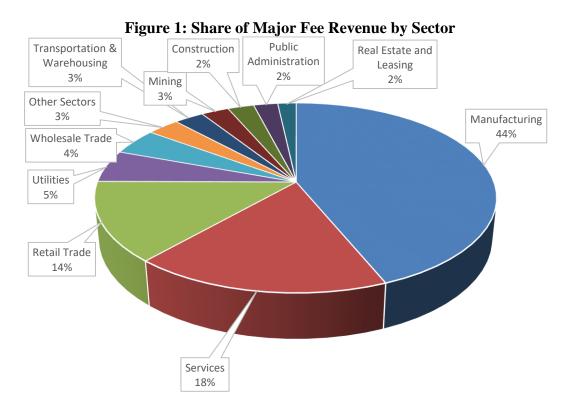
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current fee rates. Thus, these figures may differ slightly from those in Table 1, which are based on actual revenue received.

Table 5: Revenues from Major Fee Categories by Sector

		Revenues from
		Permit and
		Emission-based
Sector	NAICS	Fees (MM\$)
Agriculture, Forestry, Fishing & Hunting	11	\$0.34
Mining	21	\$2.10
Construction	23	\$1.99
Manufacturing	31-33	\$35.33
Utilities	22	\$4.43
Transportation & Warehousing	48-49	\$2.25
Information	51	\$0.81
Wholesale Trade	42	\$3.63
Retail Trade	44-45	\$10.96
Finance and Insurance	52	\$0.50
Real Estate and Rental Leasing	53	\$1.40
Services	54-81	\$14.30
Public Administration	92	\$1.83
Unclassified*	N/A	\$0.80
Total		\$80.68

The Manufacturing sector (NAICS 31-33) provides the greatest amount of fee revenue for FY 16-17 at about \$35.33 million, which is a 44 percent share of fee revenues (Figure 1). This is followed by the services sector (NAICS 54-81), providing about \$14.30 million, representing a 18 percent share, and the retail trade sector (NAICS 44-45), providing \$10.96 million, representing a 14 percent share.



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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 SCAQMD's jurisdiction. Value-added is a measure of compensation of employees, production taxes less subsidies, and gross operating surplus; thus to a certain degree reflects each industry's profit margin. Collectively, revenue from these fees is estimated to amount to approximately \$80.68 million, based on invoiced amounts at the current fee rates.

As shown in Table 6, the amount of fees paid by each industry is relatively small compared to that 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 petroleum and coal products manufacturing industry (NAICS 324) paid a total of \$14.99 million in various fees, which represented six hundredths of one percent of the sector's output and about a quarter of a percent of the sector's value-added. Other industries that also paid among the highest amount of fees relative to their outputs or value-added were the pipeline transportation industry (NAICS 486), the mining industry (NAICS 212), the nonmetallic mineral product manufacturing industry (NAICS 327), and primary metal manufacturing (NAICS 331). Overall, SCAQMD's fee revenue, as a whole, represented less than one-hundredth of one percent of the aggregate industry output or value-added in the four-county region.

Table 6: Share of Major Revenue by Detailed Industry

Industry Sector	NAICS	MM\$	% of Total	% of Total	% of Total
			Fees	Output	Value-Added
Farm (Agricultural Products)	111-112	\$0.28	0.35%	0.01%	0.01%
Agriculture & Forestry support activities	115	\$0.06	0.07%	0.01%	0.01%
Oil & Gas Extraction	211	\$1.34	1.66%	0.04%	0.05%
Mining (except oil and gas)	212	\$0.55	0.69%	0.06%	0.10%
Support Activities for Mining	213	\$0.21	0.25%	0.05%	0.07%
Utilities	22	\$4.43	5.49%	0.04%	0.05%
Construction	23	\$1.99	2.47%	0.00%	0.01%
Wood Products Mfg.	321	\$0.10	0.12%	0.01%	0.02%
Nonmetallic Mineral Product Mfg.	327	\$1.90	2.36%	0.06%	0.14%
Primary Metal Mfg.	331	\$1.63	2.03%	0.03%	0.13%
Fabricated Metal Product Mfg.	332	\$4.06	5.03%	0.02%	0.05%
Machinery Manufacturing	333	\$0.65	0.80%	0.01%	0.02%
Computer & Electronic Product Mfg.	334	\$1.01	1.25%	0.00%	0.00%
Electrical Equipment & Appliance Mfg.	335	\$0.62	0.77%	0.01%	0.03%
Motor Vehicle Mfg.	3361-3363	\$0.37	0.46%	0.01%	0.02%
Transport Equip. Mfg. Excl. Motor Veh.	3364-3369	\$1.22	1.51%	0.00%	0.01%
Furniture & Related Product Mfg.	337	\$0.31	0.39%	0.01%	0.02%
Miscellaneous Mfg.	339	\$0.56	0.70%	0.00%	0.01%
Food Mfg.	311	\$1.87	2.32%	0.01%	0.04%
Beverage and Tobacco Product Mfg.	312	\$0.35	0.43%	0.00%	0.01%
Textile & Textile Product Mills	313-314	\$0.43	0.54%	0.01%	0.05%
Apparel, Leather & Allied Product Mfg.	315-316	\$0.05	0.07%	0.00%	0.00%
Paper Mfg.	322	\$0.55	0.68%	0.01%	0.04%

⁸Output and Value-added data for 2015, the most recent historical data, by detailed industry were compiled by Regional Economic Modeling, Inc. (REMI) in 2017 year dollars.

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Industry Sector	NAICS	MM\$	% of Total Fees	% of Total Output	% of Total Value-Added
Printing & Related Support Activities	323	\$0.50	0.62%	0.01%	0.02%
Petroleum and Coal Products Mfg.	324	\$14.99	18.57%	0.06%	0.26%
Chemical Mfg.	325	\$2.72	3.37%	0.01%	0.02%
Plastics and Rubber Products Mfg.	326	\$1.44	1.78%	0.02%	0.05%
Wholesale Trade	42	\$3.63	4.50%	0.00%	0.00%
Retail Trade	44-45	\$10.96	13.59%	0.01%	0.02%
Air Transportation	481	\$0.06	0.08%	0.00%	0.00%
Rail Transportation	482	\$0.02	0.02%	0.00%	0.00%
Water Transportation	483	\$0.01	0.02%	0.00%	0.00%
Truck Transportation	484	\$0.20	0.24%	0.00%	0.00%
Couriers & Messengers	491-492	\$0.04	0.05%	0.00%	0.00%
Transit & Ground passenger Transportation	485	\$0.10	0.12%	0.00%	0.01%
Pipeline Transportation	486	\$0.67	0.83%	0.21%	0.29%
Scenic & Sightseeing Transportation	487-488	\$0.86	1.06%	0.01%	0.01%
Warehousing & Storage	493	\$0.30	0.37%	0.00%	0.01%
Publishing Industries, Except Internet	511	\$0.11	0.13%	0.00%	0.00%
Motion Picture & Sound Recording Industries	512	\$0.20	0.25%	0.00%	0.00%
Internet Services & Data Processing	518-519	\$0.07	0.09%	0.00%	0.00%
Broadcasting, Except Internet	515	\$0.09	0.11%	0.00%	0.00%
Telecommunications	517	\$0.34	0.42%	0.00%	0.00%
Monetary Authorities	521-522, 525	\$0.20	0.25%	0.00%	0.00%
Securities, Commodity Contracts, Investments	523	\$0.22	0.27%	0.00%	0.00%
Insurance Carriers & Related Activities	524	\$0.09	0.11%	0.00%	0.00%
Real Estate	531	\$1.11	1.38%	0.00%	0.00%
Rental & Leasing Services	532-533	\$0.29	0.36%	0.00%	0.00%
Professional and Technical Services	54	\$1.77	2.19%	0.00%	0.00%
Management of Companies & Enterprises	55	\$0.05	0.06%	0.00%	0.00%
Administrative & Support Services	561	\$1.50	1.86%	0.00%	0.00%
Waste Management & Remediation Services	562	\$1.80	2.23%	0.04%	0.08%
Education Services	61	\$1.26	1.56%	0.01%	0.01%
Ambulatory Health Care Services	621	\$0.54	0.67%	0.00%	0.00%
Hospitals	622	\$0.89	1.11%	0.00%	0.01%
Nursing & Residential Care Facilities	623	\$0.17	0.21%	0.00%	0.00%
Social Assistance	624	\$0.11	0.13%	0.00%	0.00%
Performing Arts & Spectator Sports	711	\$0.08	0.10%	0.00%	0.00%
Museums, Historical Sites, Zoos, and Parks	712	\$0.03	0.04%	0.00%	0.01%
Amusement, Gambling, and Recreation	713	\$0.39	0.48%	0.00%	0.01%
Accommodation	721	\$0.33	0.41%	0.00%	0.01%
Food Services & Drinking Places	722	\$0.78	0.96%	0.00%	0.00%
Repair & Maintenance	811	\$3.11	3.86%	0.02%	0.03%
Personal & Laundry Services	812	\$1.18	1.46%	0.01%	0.01%
Membership Associations and Organizations	813	\$0.31	0.39%	0.00%	0.01%
Government	92	\$1.83	2.27%	0.00%	0.00%
Unclassified*	N/A	\$0.80	0.99%		
Totals		\$80.68	100%	0.005%	0.007%

^{*}Facilities with no NAICS codes assigned are categorized as "unclassified."

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, which is 3.4 percent for the period of December 2016 to December 2017 unless the Board decides in a rulemaking hearing to forgo the CPI increase. In order to analyze only the impact of the CPI-based increase, the estimation is based on FY 16-17 emissions and the current equipment and activity profile of individual facilities. Thus, this estimate excludes any other changes to revenue, such as Title V/Non-Title V fee increase, additional state funding, and changes in activity levels, as discussed in the Revenue Trend section. Based on this methodology, the fee rate increases from the 3.4 percent CPI increase are estimated to increase total SCAQMD revenue by approximately \$2.74 million. This estimate is only for the CPI-based increase and thus differs from the estimate in Table 1, for reasons discussed above.

Table 7 shows the distribution of these fee changes across the affected industries. It includes the majority subset of the fees subject to the CPI-based rate increase. They include emission fees, permit processing fees, annual permit renewal fees, AB 2588 fees, source test fees, and a portion of Rule 2202 fees.

The manufacturing sector as a whole would experience the largest increase in fees (approximately \$1.20 million for about 3,700 facilities), followed by the services sector (approximately \$0.48 million for about 10,600 facilities), the retail trade sector (approximately \$0.37 million for about 4,000 facilities), with the remaining sectors accounting for \$0.68 million. Within the manufacturing sector, the petroleum and coal products manufacturing industry, mostly comprised of refineries, will have an increase of around \$0.51 million, or over 18 percent of the overall increase.

SUMMARY

The above analysis provides background information on SCAQMD's revenue and summarizes the economic impact on facilities regulated by SCAQMD 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, SCAQMD revenues are expected to increase by \$2.74 million as a result of this fee rate increase. However, the amount of SCAQMD fees paid by each industry remained small relative to the industry's economic output or value-added (less than 0.01 percent overall).

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⁹ A socioeconomic assessment of proposed amendments to Regulation III with fee impacts will be released at least 30 days prior to the public hearing, which is currently scheduled for May 4, 2018.

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

Table 7: Kevenue Impact	of the Fee Ka	ic increase	by muustry k	occioi
Industry	NAICS	Estimated Number of Affected	Revenue Change Due to 3.4% CPI	Percent of Total CPI
		Facilities	Adjustment	Increase
Agriculture, Forestry, Fishing & Hunting	111-115	114	\$11,512	0.42%
Mining	21	340	\$71,309	2.60%
Oil and Gas Extraction	211	223	\$45,502	1.66%
Mining (except oil and gas)	212-213	117	\$25,807	0.94%
Construction	23	1,072	\$67,626	2.47%
Manufacturing	31-33	3,715	\$1,201,262	43.79%
Food Manufacturing	311	231	\$63,693	2.32%
Wood Products Manufacturing	321	82	\$3,335	0.12%
Petroleum and Coal Products Mfg.	324	98	\$509,491	18.57%
Chemical Manufacturing	325	352	\$92,367	3.37%
Nonmetallic Mineral Product Mfg.	327	234	\$64,655	2.36%
Primary & Fabricated Metal Mfg.	331-332	846	\$193,653	7.06%
Machinery Manufacturing	333	204	\$21,988	0.80%
Computer and Electronic Product Mfg.	334	275	\$34,205	1.25%
Electrical Equipment & Appliance Mfg.	335	124	\$21,156	0.77%
Motor Vehicle & Trans. Equipment Mfg.	336	241	\$53,892	1.96%
Other Manufacturing	312-339	1,028	\$142,827	5.21%
Utilities	22	1,042	\$150,505	5.49%
Transportation & Warehousing	48-49	632	\$76,660	2.79%
Information	51	747	\$27,664	1.01%
Publishing Industries, Except Internet	511	34	\$3,635	0.13%
Motion Picture & Sound Recording	512	76	\$6,862	0.25%
Internet Services and data processing	518, 519	55	\$2,534	0.09%
Other Information	Other in 51	582	\$14,633	0.53%
Wholesale Trade	42	1,205	\$123,528	4.50%
Retail Trade	44-45	3,979	\$372,734	13.59%
Car & Parts Dealers	441	302	\$13,498	0.49%
Gas Stations	447	1,821	\$234,605	8.55%
Other Retail Trade	Other in 44-45	1,856	\$124,632	4.54%
Finance and Insurance	52	356	\$17,140	0.62%
Real Estate and Rental Leasing	53	1,170	\$47,568	1.73%
Services	54-81	10,634	\$486,173	17.72%
Professional and Technical Services	54	793	\$60,077	2.19%
Accommodation	721	272	\$11,311	0.41%
Food Services & Drinking Places	722	2,378	\$26,378	0.96%
Automotive Repairs & Maintenance	8111	2,271	\$90,733	3.31%
Dry Cleaning & Laundry Services	8123	1,239	\$29,480	1.07%
Health Care & Social Assistance	62	830	\$58,231	2.12%
Other Services	Other in 54-81	2,851	\$209,964	7.65%
Public Administration	92	1,529	\$62,167	2.27%
Unclassified*	N/A	398	\$27,127	0.99%
Totals		26,933	\$2,742,975	100%

^{*}Facilities with no NAICS codes assigned are categorized as "unclassified."

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