

BOARD MEETING DATE: April 3, 2015

AGENDA NO. 22

REPORT: Mobile Source Committee

SYNOPSIS: The Mobile Source Committee met on Friday, March 20, 2015. Following is a summary of that meeting. The next Mobile Source Committee meeting is scheduled for Friday, April 17, 2015 at 9:00 a.m.

RECOMMENDED ACTION:
Receive and file.

Dr. Clark E. Parker, Sr., Chair
Mobile Source Committee

EC: PMF: afm

Attendance

Committee Chair Dr. Clark E. Parker, Sr., and Committee Member Shawn Nelson attended via videoconference; Committee Members Ben Benoit, Dr. Joseph Lyou and Judith Mitchell attended the meeting at the SCAQMD Diamond Bar headquarters.

The following items were presented:

INFORMATIONAL ITEMS:

1) Adopt Rule 2202 Emission Reduction Quantification Protocol for Electric Vehicle Charging Station Projects

Mr. Dean Saito, Planning and Rules Manager, provided an update on the development of a protocol for purposes of generating emission reduction credits under Rule 2202 for workplace charge stations. The protocol development was initiated based on a request from Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE) to develop a protocol to generate credits for workplace charge stations as part of a Rule 2202(f)(6) application on January 14, 2014. Staff worked with LADWP and SCE on developing a proposed methodology and protocol. The draft protocol was released in October 2014 and underwent a public review process, which included a public consultative meeting and CEQA scoping meeting in November 2014. A CEQA Environmental Analysis was released in January 2014.

Comments received included five comment letters submitted on the draft protocol and two comment letters on the Environmental Analysis. Proposed language modifications based on comments received on the draft protocol included the following: 1) proration of credits if station received public funding assistance; 2) electric vehicle charging station eligible for credits for those installed after January 14, 2014; and 3) streamline provisions related to reporting and monitoring of electricity usage. Next steps include the release of the revised draft protocol for public review, set public hearing date at the April 2015 Board meeting, responses to CEQA comments incorporated into final EA, and Board consideration at May Board meeting.

Councilmember Mitchell asked a question regarding the relationship between the credits generated under the protocol and CARB ZEV (zero-emission vehicles) credits. Staff indicated that the credits are different in nature. The ZEV credits provide flexibility to vehicle manufacturers for the production of ZEVs. Credits generated under the proposed protocol will be used for Rule 2202 compliance and can only be used by affected Rule 2202 employers for compliance purposes.

Dr. Parker asked about the results of the CEQA Environmental Analysis. Staff indicated that the analysis concluded the impacts to be not significant with the chief impact being the construction activity associated with installation of the electric charge stations. Dr. Parker inquired as to who will be issuing the credits and if additional staff resources will be needed to evaluate the credits generated. Staff indicated that the SCAQMD will be approving any credit issuance and no additional resources are anticipated since the SCAQMD has been approving credit issuances for other mobile source projects in the past. The project proponents, which could include employers subject to Rule 2202; utilities (i.e. LADWP or SCE) promoting electric vehicles; and third-party entities who install electric charging stations (i.e. Blink, Charge Point), would submit an application to implement a project and be responsible for monitoring and reporting the electricity consumption used for vehicle charging. The project proponent will calculate the associated credits generated and submit for approval by the SCAQMD.

Councilmember Mitchell inquired as to how the prorated credits would work based upon amount of public funding. Staff indicated that the credits will be discounted based on the amount of public funding compared to the total cost of the charging stations.

Dr. Lyou asked what staff thought the value of the credits would be. Staff responded that it is difficult to anticipate the value of the credits at this time since there have not been any projects of this nature. However, staff did do an analysis and verified that the credits would be less than the market value currently given for dedicated electric vehicles in the Rule 2202 AVR formula. Dr. Lyou inquired about the current status of

Rule 2202 as a SIP Rule. Staff indicated that there was a conference call with U.S. EPA to discuss outstanding SIP issues related to Rule 2202. Staff indicated that at a minimum staff can take credit retrospectively from Rule 2202 based on actual emission reductions achieved.

Mr. Marvin Moon, LADWP, commented that this is a positive step in encouraging workplace charging. LADWP believes that there are a lot of positive applications for its customers, but most important it gives businesses an economic incentive to install workplace charging in assisting them to comply with Rule 2202. Dr. Parker inquired if LADWP is considering lowering the rate for electric vehicle charging. LADWP responded that it does offer a lower rate for electric vehicle charging for those entities with separate meters and that LADWP is considering other programs which will lower the rate for EV charging.

Mr. Tom Gross, Southern California Edison, commented that this program fits nicely with SCE's "Charge Readiness Program" that is currently before the California Public Utilities Commission. This program is an added tool to incentivize workplace charging and SCE sees this as added incentive to employers to install workplace charging. Dr. Parker asked SCE whether they would allow separate metering of the charging stations and SCE responded that they thought they would allow sub-metering of the electric charging stations.

Mr. Rick Teebay, County of Los Angeles, commented that L.A. County has installed 116 electric vehicle supply equipment (EVSE) since July of 2014. Recently, L.A. County staff estimated the kilowatt usage associated with the current EVSE and it equated to 100,000 miles per month of gasoline usage eliminated. L.A. County installed revenue-grade meters to recoup the cost of electrical charges and as they take this before their Board, staff believed it would be critical to be able to explain to the board that credits would be able to help offset the initial cost of the electric charge stations.

2) Amend Rule 2202 Employee Commute Reduction Program Guidelines

Ms. Carol Gomez, Planning and Rules Manager, presented a summary of proposed Rule 2202 Employee Commute Reduction Program (ECRP) Guidelines amendments as a follow-up to the Board's June 2014 direction to recommend an ECRP streamlining proposal.

Staff's proposal contains two new Average Vehicle Ridership (AVR) incentive programs. The first is a High AVR program which would replace the current High AVR No-Fault Inspection program. The second is an AVR Improvement Program. Both programs would offer a reduced filing fee and streamline the plan submittal requirements.

In addition to these AVR incentive programs, staff is also proposing to streamline the ECRP program by removing the Employer Clean Fleet Purchase/Lease Program and the Mobile Source Diesel PM/NOX Emission Minimization Program requirements. Staff is proposing to remove the Clean Fleet requirement, as CARB's vehicle emission standards have risen to a point where the vehicles purchased for fleet vehicles meet the rule's certification standards. Similarly, in regards to the diesel PM/NOX emission program, since the inclusion of this requirement, CARB has adopted an In-Use Off-Road Diesel Vehicle Regulation and an Off-Road Compression-Ignition Engines and Equipment Regulation, both of which go beyond the requirements of Rule 2202 and apply to a broader audience.

Key comments received from the regulated community include a request to drop the High AVR fee below the Emission Reduction Strategy fee level. While the current proposal reflects cost recovery, staff is evaluating the request. Additionally a request was made to amend the annual AVR survey requirement to every other year. Rule 2202 is an emission reduction rule; therefore annual surveys are needed as an indicator of performance.

[Supervisor Shawn Nelson arrived at the Hall of Administration videoconference location at 10:15 a.m.]

Dr. Lyou asked about metrics to measure increases in ridesharing activity. How do we know that ridesharing has been increasing over time? Ms. Gomez replied that employers have a menu of options and can voluntarily switch from one compliance option to another at any time; staff can, however, take a look at the AVR data collected from ECRP submittals. Dr. Parker inquired about the impacts of commute vs. non-commute trips, and asked how many trips have been reduced since the inception of the program. He suggested setting baseline data to determine the total trip reductions accomplished over time. Dr. Parker asked Supervisor Nelson to provide an insight on trip reduction data available at Metrolink. Supervisor Nelson stated that SCAG has detailed regional transportation data. He further stated that it is critical to build rail transit stations very close to jobs centers for employees to get to work by transit. DEO Elaine Chang suggested that SCAG give a presentation on this topic at a future Mobile Source Committee Meeting.

Staff will bring the proposed amendments to the Rule 2202 ECRP Guidelines to the May 1, 2015 Board meeting.

3) Overview of the PM2.5 Impact at Mira Loma

Mr. Joe Cassmassi, Planning and Rules Manager, provided an overview of PM2.5 levels observed at Mira Loma, describing the history behind establishing a monitoring

site in the area, the emissions and mechanisms contributing to high concentrations, and several of the analyses conducted to assess potential controls that will lead to attainment of the 24-hour standard as well as the revised annual standard.

During the presentation Dr. Lyou inquired about the optimal means to reduce PM_{2.5}. Mr. Cassmassi responded that we were focusing on directly emitted particulates as well as precursors, including NO_x, SO_x, VOC and ammonia. He pointed out that controls on dairy farms, fleet turnover, composting and RECLAIM were among the mechanisms at hand to reduce the precursors identified by U.S. EPA for PM_{2.5} control. Dr. Philip Fine, Assistant Deputy Executive Officer/Planning, Rule Development & Area Sources added that only biogenic emissions (VOC) are not controllable. Dr. Lyou also commented on the use of backward trajectories to establish source contribution areas to the Mira Loma impact. Dr. Fine responded that the areas adjacent to Mira Loma have a greater impact on the observed concentrations.

Dr. Parker asked how the relative emission reduction factors for PM_{2.5} were derived. He further inquired as to whether they were developed from monitoring data or from regional simulations and chemical assessments? Mr. Cassmassi responded that the relative emission reduction factors were derived from assessing regional modeling in conjunction with emissions data. Dr. Parker asked if the impact to Mira Loma was a function of the residence time of particulates in the atmosphere. Mr. Cassmassi commented that staff could assess the impact of controls on residential wood burning and can quantify the reduction of ambient PM_{2.5} due to burning restrictions. He also commented that under multiday episodes, carryover from one day to the next could mask the impact of controls.

Dr. Fine pointed to the slides depicting the source apportionment analysis and the emission-weighted contribution chart to illustrate that cooking-related emissions were a significant factor for PM_{2.5} in the area. Dr. Lyou asked what other agencies have done to control particulate emissions from cooking activities. Dr. Fine said the rules in the Bay Area and San Joaquin air districts address a portion of the problem. He then focused on ongoing research being conducted at the University of California Riverside addressing emissions from commercial charbroilers. Dr. Fine pointed out that while it may be desirable to control 80-90 percent of the emissions from cooking, 50 percent or lower may be achievable and contribute to solving the problem. Mayor Benoit asked if animal feed ammonia management was an effective control. Dr. Fine responded that it was as one measure, but area spray applications are also possible to reduce ammonia.

Mr. Henry Hogo, Assistant Deputy Executive Officer/Science & Technology Advancement, added that the source apportionment chart really focused on nitrates as the key to attainment. The committee asked what control strategy would reduce the

nitrate and staff responded that the current NOx-heavy reduction strategy should achieve the result.

WRITTEN REPORTS:

4) **Rule 2202 Activity Report**

The report was received as submitted.

5) **Monthly Report on Environmental Justice Initiatives – CEQA Document Commenting Update**

The report was received as submitted.

OTHER BUSINESS:

None

PUBLIC COMMENT:

None

The meeting was adjourned at 11:03 a.m.

Attachment

Attendance Roster

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MOBILE SOURCE COMMITTEE MEETING
Attendance Roster- March 20, 2015**

NAME	AFFILIATION
Dr. Clark E. Parker, Sr.	SCAQMD Governing Board (<i>via videoconference</i>)
Dr. Joseph Lyou	SCAQMD Governing Board
Mayor Ben Benoit	SCAQMD Governing Board
Councilmember Judith Mitchell	SCAQMD Governing Board
Supervisor Shawn Nelson	SCAQMD Governing Board (<i>via videoconference</i>)
Board Consultant Mark Abramowitz/	SCAQMD Governing Board (Lyou)
Board Consultant Chung Liu	SCAQMD Governing Board (Mitchell)
Ruthanne Taylor-Berger	SCAQMD Governing Board (Benoit)
Tom Gross	Southern California Edison
Rongsheng Luo	Southern California Association of Governments
Marvin Moon	Los Angeles Department of Water and Power
Bill Pearco	Boeing
Dat Quach	Los Angeles Department of Water and Power
David Rothbart	Los Angeles County Sanitation Districts
Claire Spencer	Tesoro
Susan Stark	Tesoro
Rick Teebay	County of Los Angeles
Christine Truong	Los Angeles Department of Water and Power
Elaine Chang	SCAQMD Staff
Philip Fine	SCAQMD Staff
Barbara Baird	SCAQMD Staff
Matt Miyasato	SCAQMD Staff
Henry Hogo	SCAQMD Staff
Dean Saito	SCAQMD Staff
Joe Cassmassi	SCAQMD Staff
Carol Gomez	SCAQMD Staff
Chris Marlia	SCAQMD Staff
Sam Atwood	SCAQMD Staff
Kim White	SCAQMD Staff