



South Coast Air Quality Management District

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Joseph Goffman, Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Mr. Goffman and Chair Randolph:

The South Coast Air Quality Management District (South Coast AQMD) is committed to providing clean air for all, including the critical mission to further reduce NO_x emissions that contribute to ozone pollution in the South Coast Air Basin. In valued partnership with the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB), South Coast AQMD will continue to do its part, rising to the collective challenge, using its authorities, and working with stakeholders and communities to deliver solutions to address the region's ozone pollution. To do this, South Coast AQMD will extend the agency's legacy of embracing innovative technologies and adopting rules and regulations with nation-leading stringency. South Coast AQMD, as a measure of good will, here memorializes certain existing works-in-progress and intended, future actions that have a common purpose to reduce NO_x or to lay important groundwork for potential future NO_x reductions.

While air quality has dramatically improved over the years, our region still exceeds National Ambient Air Quality Standards (NAAQS) for particulate matter and ozone, and experiences some of the worst air pollution in the nation. Over 17 million people reside in our region, and we are home to two-thirds of California's environmental justice (EJ) population. These frontline communities suffer the brunt of the impacts of air pollution. We estimate that approximately 1,500 premature deaths would be avoided annually if our region were able to attain the NAAQS.

As an extreme ozone nonattainment area, South Coast AQMD has implemented the most stringent regulations in the nation for stationary sources – power plants, refineries, and industrial facilities for which we have direct regulatory authority. We have established Best Available Retrofit Control Technology (BARCT) standards in rules that impose strict emission limits for virtually every combustion category of stationary sources to reduce NOx emissions to the greatest extent feasible. Since the 80 ppb ozone standard was established in 1997, we have cut emissions dramatically – emissions of nitrogen oxides (NOx), the key pollutant responsible for ozone formation in our region – have been reduced by over 75 percent. Despite these aggressive actions, NOx emissions must be reduced even further to meet ozone standards. Per our 2022 Air Quality Management Plan, we are implementing strategies to pursue zero emission technologies across all sectors wherever feasible.

The South Coast Air Basin is home to the Ports of Long Beach and Los Angeles, the largest port complex in the nation, and LAX, the fifth largest airport in the nation. Goods delivered to and from these facilities traverse across our region to rail yards and warehouses, and are often ultimately bound for destinations throughout the nation. This activity results in significant emissions from ships, aircraft, interstate trucks, locomotives, and other non-road engines. Today, over 80 percent of NOx emissions within the basin are from mobile sources, and of these, it is the ships, aircraft, interstate trucks, locomotives, and similar heavy-duty engines that are responsible for about three-quarters of these emissions.

It is impossible to attain all ozone standards absent further action from U.S. EPA. In particular, new and continued actions are needed on sources primarily under federal authority, including ships, aircraft, interstate trucks, locomotives, and other non-road engines. And it is not just our area that needs federal action to meet ozone standards. Regions of the country that have never had to contend with protracted ozone nonattainment are slipping into higher levels of ozone nonattainment. In the future, these areas will find themselves in the same position as South Coast AQMD unless U.S. EPA takes immediate action to reduce emissions from federally regulated sources.

Recognizing that all agencies have a role to play in continuing to reduce emissions, the attachment to this letter details actions that South Coast AQMD intends to pursue. These actions, combined with actions from U.S. EPA and CARB, will be needed to meet all ozone standards. We anticipate that the actions below will result in approximately four and a half tons per day of new NOx emission reductions in the South Coast Air Basin in 2033, primarily from stationary sources. Facility-based measures may add to this total, depending in part on future actions also taken by U.S. EPA and CARB. Further, our agencies must commit to work for a “Whole of Government” approach as air quality intersects with

transportation, energy, and other sectors to protect public health and economic activity and jobs.

This letter does not purport to be exhaustive or comprehensive of all actions that South Coast AQMD could or would endeavor to pursue to meet ozone health standards in the South Coast Air Basin. South Coast AQMD staff, consistent with Governing Board direction, will develop and seek adoption of new rules or measures as potential State Implementation Plan revisions following any applicable procedural requirements and, wherever needed, ensure appropriate supporting administrative and technical information is provided to CARB and U.S. EPA. This letter is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any person against South Coast AQMD. South Coast AQMD reserves all rights and defenses, including the right to petition. Recognizing that emission standards for mobile sources are established by state or federal agencies, South Coast AQMD will continue to tirelessly advocate for all practical and innovative strategies to reduce those sources of emissions. Above all, South Coast AQMD, whether in a leading, partnering or supporting role, commits to following the science and the law as it continues to work to clean the air and protect the health of all residents.

Sincerely,



Vanessa Delgado
Governing Board Chair
South Coast AQMD

Attachment

Attachment: South Coast AQMD Commitments for Action

Aircraft/Airports:

- Leverage partnerships from existing Memoranda of Understanding (MOUs) between South Coast AQMD and airports to explore technology demonstration projects for lower emission technologies.
- Explore new mechanisms to reduce emissions from airports including potentially revisiting existing Airport MOUs or through a future airport indirect source rule.
- Pursue technology demonstration projects for zero emissions ground operation for aircraft and its supporting equipment and associated infrastructure.
- Jointly host a technology forum with CARB, U.S. EPA, and other agencies as appropriate on the operational practices and economics of aircraft routing within the state, country, and internationally.
- Jointly host a technology forum with the CARB, U.S. EPA, and other agencies as appropriate on strategies for lowering NOx emissions from aircraft, including through improved combustor design, selective catalytic reduction, water-in-fuel, or other emission reduction strategies.

Locomotives/Railyards:

- Bring an indirect source rule on freight rail yards (Proposed Rule 2306) to our Governing Board for consideration in August 2024.
- Pursue technology demonstration projects for zero emissions locomotives and associated infrastructure.

Off-Road/Non-Road:

- Explore development of a loaner program for zero emissions construction equipment, including associated infrastructure.
- Develop and bring new Facility-Based Mobile Source Measures for new/redevelopment projects to our Governing Board for consideration, including potential development of an indirect source rule.
- Collaborate with relevant agencies on other facilitating measures such as:
 - Technology assessments of charging fueling standards and infrastructure for non-road applications; and
 - Market assessments of zero emissions technology for different non-road applications and duty cycles.

Ocean-Going Vessels (OGVs)/Ports:

- Bring indirect source rule on container terminals at marine ports (Proposed Rule 2304) to our Governing Board for consideration by 1st quarter 2025.
- Jointly host a technology forum with CARB, U.S. EPA, and other agencies as appropriate to focus on excess low-load NOx emissions, fuels of the future, and solicit ideas from, the public, shippers, carriers, and other supply chain stakeholders for future emission reductions.

- Seek funding and pursue emissions testing for conventional and alternative fuels.
- Continue to seek funding and opportunities for OGV engine retrofit demonstration projects.
- Seek opportunities for establishing long term funding to support a Clean Ship Visit Program.
- Provide technical support and build on previous work for the Pacific Rim Maritime Emissions Reduction (PRIMER) initiative to develop a Clean Ship Visit Program.

Stationary Sources:

- Review where accelerated reductions could be possible, including through rulemaking to achieve emission reductions on a more accelerated timeline than identified in the 2022 AQMP.