

APPENDIX B

**Emissions Reduction Analysis for Proposed
Rule 9510 (Indirect Source Review) and
Rule 3180 (Administrative Fees for Indirect Source Review)**

December 15, 2005

**EMISSION REDUCTION ANALYSIS FOR
RULE 9510 (Indirect Source Review)**

I. INTRODUCTION

Both the 2003 PM10 Plan and the Extreme Ozone Attainment Demonstration Plan, contain emissions reduction commitments for proposed Rule 9510 of 4.1 tons per day of NOx and 5.2 tons per day of PM10 to be achieved by 2010. Those estimates were based on assumptions at the time and are commitments that are necessary to assist the district in meeting the federal and state PM10 and ozone standards. This appendix contains emissions and emissions reduction estimates that update those original estimates.

II. BASELINE EMISSIONS

A. Sources of Emissions from New Development

It is generally accepted in both air quality and transportation planning, as well as in case law that new emissions occur from new development. The construction of new structures is undertaken in order to accommodate the growth in population of a particular area. With the projected growth and development in the San Joaquin Valley Air Basin (SJVAB), there will also be a corresponding growth in emissions from energy usage, landscape maintenance equipment, wood combustion, motor vehicles, and entrained dust from paved and unpaved roads.

Energy Usage

Emissions associated with energy usage from new development primarily occur from two different sources, electricity generation and fuel combustion. NOx and PM10 emissions result from using space heating, water heating, cooking, and from other miscellaneous electrical appliances/equipment. ARB estimates fuel combustion emissions from natural gas, distillate oil or LPG, using EPA emission factors, and gas sales.¹ Emissions attributed to use of electricity generated at power plants are not easily quantified due to the variety of sources that supply electricity, which are located in and out of the basin and the state. Therefore, electrical generation emissions associated with new development will not be quantified or addressed for this program.

¹ Air Resources Board, Emissions Inventory Procedural Manual, Vol. III, Methods for Assessing Area Source Emissions, October 1997 with revisions through November 1998, section 7.2-7.3.

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Landscape maintenance equipment

Landscape maintenance equipment generates NO_x and PM₁₀ emissions from fuel combustion (gasoline, diesel, or LPG or CNG) and from evaporation of unused fuel. Equipment in this category can include leaf blowers, lawn mowers, trimmers, edgers, chainsaws, chippers, etc. ARB uses the OFF-ROAD model to estimate PM₁₀ and NO_x emissions using population, activity duration, and emission factors.² URBEMIS uses OFF-ROAD results and quantifies emissions by the number of homes and business units.³ Based on District analysis, the growth in NO_x and PM₁₀ emissions from residential landscape maintenance equipment is relatively small, 15 tons per year, despite a projected increase of nearly 1.8 million pieces of residential landscape equipment in the SJVAB. The primary reason for the small emissions increase is that the new equipment is significantly cleaner than the older equipment.

Wood Combustion

Residential wood combustion emissions of PM₁₀ and NO_x come from burning wood or similar materials inside fireplaces, wood stoves and inserts. ARB estimates emissions totals using the following factors: tons of wood used per house, BTU rating per cord, number of houses, fraction of active wood combustion devices, average number of days burned per house, and other representative factors.⁴ The recent amendment to Rule 4901 (Wood Burning Fireplaces and Wood Burning Heaters) will reduce a significant portion of emissions from those devices. Rule 4901 contains limits on wood combustion devices in new development, however, it still allows new devices in a development of a certain size or larger. Therefore, reductions from this category can still occur if the development can still install those devices and chooses not to.

Motor Vehicle Emissions

Motor vehicle emissions is the largest category of emissions attributed to new development. The inventory includes estimates of exhaust and evaporative VOCs, NO_x, and PM₁₀ associated with exhaust, tire wear and brake wear. On-road motor vehicles account for approximately 43% of the entire NO_x inventory for 2002.⁵ ARB estimates emissions from on-road vehicles using the EMFAC2002 model, which uses emission factors, vehicle numbers and vehicle activity. Emission rates are derived primarily from direct testing by the state or EPA. Vehicle population and vehicle age data are obtained from the Department of Motor Vehicles (DMV). Travel activity, which includes vehicle miles traveled (VMT), distribution of VMT by speed, the number of trips taken per vehicle each day, are provided by the California Department of Transportation

2 Staff report for Public Meeting to Consider Approval of the California Small Off-road engine emissions inventory, http://www.arb.ca.gov/msei/off-road/pubs/sore_final.doc

3 URBEMIS2002 Users' Guide, Version 7.4, May 2003, Appendix B.

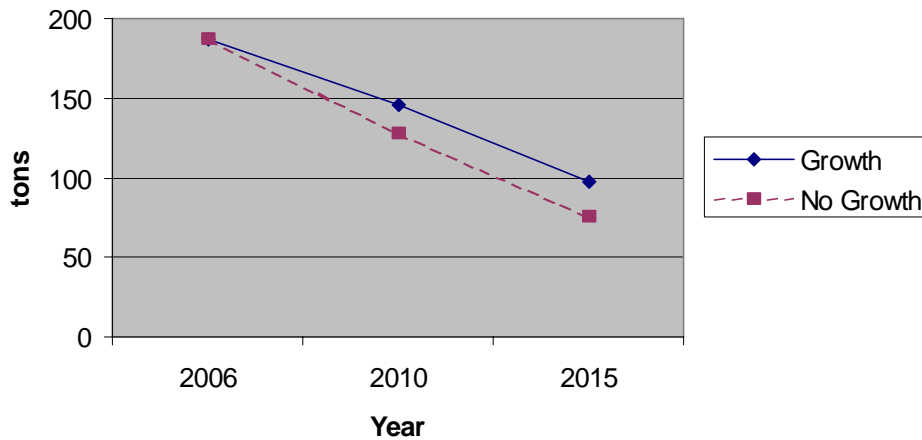
4 Air Resources Board, Emissions Inventory Procedural Manual, Vol. III, Methods for Assessing Area Source Emissions, October 1997 with revisions through November 1998, section 7.1.

5 2003 PM₁₀ Plan, Chapter 3, NO_x Emissions Inventory

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(Caltrans), local Metropolitan Planning Organizations (MPOs), local Councils of Governments (COGs), and fleet monitoring.⁶ URBEMIS quantifies vehicle emissions attributed to a particular development based on the emission factors and vehicle activity found in EMFAC2002, in combination with project specific data. While the motor vehicle emissions inventory in both the PM10 and ozone plans show that vehicle emissions are declining, emissions would have declined even more if growth were not to occur, thus hampering the ability of the region to reach attainment of the PM10 and ozone standards. The following chart shows the emissions from all motor vehicles for the current population if it would have remained constant (No-Growth), and the emissions from vehicles for the projected population as reported in the 2003 PM10 Plan emissions inventory (Growth). Based on an analysis performed by ARB using EMFAC2002, which can be found in Attachment 1, the difference is an estimated 17.3 tons per day of NOx attributed to projected increase in growth in the SJVAB between 2006 and 2010.

Figure 1
Difference in NOx Emissions for All Vehicle Types



Re-entrained Road Dust

PM10 emissions from road dust occur by vehicles driving on unpaved roads, or by vehicles entraining or re-entraining dust on paved roads. ARB estimates PM10 emissions by using the following factors for different road types: silt loading on roads, vehicle weight, and VMT traveled. The majority of new development occurs on or creates new paved roads, however, some development in rural areas still use unpaved roads. Unpaved road emissions are estimated by using an emission factor and total VMT traveled.⁷

6 Overview of the On-Road Emissions Inventory, <http://www.arb.ca.gov/msei/on-road/briefs/emfac6.pdf>

7 Air Resources Board, Emissions Inventory Procedural Manual, Vol. III, Methods for Assessing Area Source Emissions, October 1997 with revisions through November 1998, section 7.9-7.10.

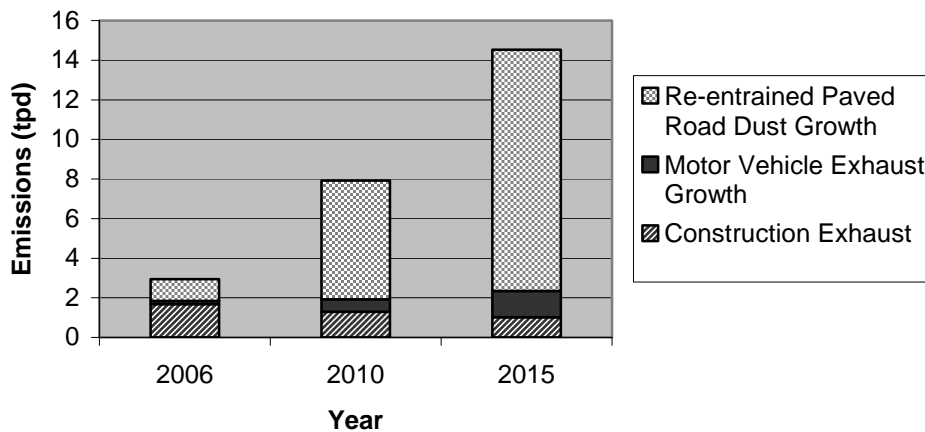
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Construction

This category of emissions differ slightly from the others, since all emissions from construction are due to new development, regardless of growth in the category. Emissions associated with construction activities occur for the purpose of building residential, commercial, industrial, institutional, or governmental structures. Emissions result predominantly from equipment associated with site preparation work, which may include scraping, grading, loading, digging, compacting, and other operations. ARB estimates construction emissions by utilizing a computer model called OFF-ROAD. The construction emissions in the OFF-ROAD model are estimated using the population, activity, and fuel usage of the varied types of construction equipment.

The following figure demonstrates PM10 emissions and emissions growth from construction equipment, re-entrained paved road dust, and vehicle exhaust associated with new development.

Figure 2
PM10 Emissions from Development



B. Projected Emissions from New Development

The following table illustrates the projected growth in emissions, as can be discerned from the emissions inventory:

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Total Emissions Attributed to Land Use Growth in the SJVAB in 2010

NOx

Emissions Category	Emissions from Growth In 2010 (tpd)	Emissions from Growth during 2006-2010 (tpd)
On-road Vehicles ^A	2.2	17.3
Construction Equipment ^C	21.3	21.3
Total NOx	23.5	137.8

PM10

Construction Equipment ^C	1.4	1.4
On-road Vehicles ^A	0.2	0.6
Paved Road Dust ^B	1.1	5.2
Total PM10	2.7	13.4

A. Emissions Growth between 2006 and 2010 was estimated based on an ARB EMFAC 2002 version 2.2 run, dated June 10, 2005 (Attachment 1). This will be revised to obtain a total for 2006.

B. 2003 PM10 Plan emissions inventory

C. ARB Emission Inventory for 2010

It should be noted that some sources of emissions from new development are not included in the above table for several reasons. While there may be difficulties in assessing what portions of the emissions inventory are resulting from new growth, there are new emissions from growth occurring. Therefore, the above table represents a conservative estimate of what will occur, and does not overestimate. Therefore, any reductions applied to the emissions outlined in the above table will represent a conservative estimate of actual reductions resulting from this program.

III. EMISSIONS REDUCTION OPTIONS FOR NEW DEVELOPMENT

A. On-site Project-Specific Emissions Reductions

On-site mitigation measures and their corresponding emission reduction methodologies were developed by Nelson/Nygaard and put into URBEMIS. The following discussion lists measures/conditions, if implemented that would result in emissions reductions from a development project. The maximum percent reduction is in general terms. The actual reduction relies on project specific information and factors, and how the mitigation measure is used in combination with other measures.

Increase Energy Efficiency Beyond Title 24

This measure would reduce emissions by decreasing the amount of natural gas that is needed and in turn combusted for a particular development. Examples of how this could be achieved include: using insulation in the attic and walls, insulating ductwork, using whole house fans, double-paned and/or high performance glazed windows, maximizing the use of natural lighting, installing EnergyStar appliances, orienting the

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building north or south to utilize passive heating and cooling, designing the building to maximize natural ventilation, or any number of other items that would decrease the use of natural gas, and therefore decrease emissions. The emissions reductions associated with this mitigation measure in URBEMIS would require a quantification of the % reduction beyond what is already required by Title 24 as determined by a computer model developed for Title 24 purposes.

Electrical landscape maintenance equipment

This measure would reduce emissions by eliminating some or all of the combustion of gasoline or diesel in standard landscape equipment by replacing it with equipment that relies on batteries, an electrical outlet, or manually-powered equipment. Emissions reductions are quantified by using the % of the development that would use non-combustion powered equipment.

Hearth

This measure would reduce emissions by eliminating construction of a wood combustion device that would have otherwise been allowed under Rule 4901.

Net Residential Density

Emissions reductions from this measure would occur when an individual from a particular residential use forgoes the use of the automobile and uses an alternate form of transportation. A considerable volume of research has investigated the links between density and travel behavior and has determined that there is a significant and quantifiable relationship between residential density and automobile use. Three key studies of travel behavior and density itself have identified elasticities, which has been used to develop a formula to determine the reduction in vehicle trips and vehicle miles traveled, and the corresponding emissions reductions. The maximum reduction in trips/VMT and resulting emissions that may occur from this measure is calculated to be 55%.

Mix of Uses

Emissions reductions from this measure would occur when an individual forgoes the use of the automobile and uses other forms of transportation. Research has shown that there is an impact of diversity or mix of uses on travel behavior, which can occur at the macro-scale, such as jobs-housing balance. Numerous studies of travel behavior and mix of uses have identified elasticities, which has been used to develop a formula to determine the reduction in vehicle trips and vehicle miles traveled, and the corresponding emissions reductions. The maximum reduction in trips/VMT and resulting emissions that may occur from this measure is calculated to be 9%.

Local Serving Retail

Emissions reductions from this measure occur when an individual forgoes the use of the automobile, since the proximity of the retail encourages other forms of transportation. The maximum reduction in trips/VMT and resulting emissions that may occur from this measure is calculated to be 2%.

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Transit Service

Emissions reductions from this measure would occur when an individual forgoes the use of the automobile and uses transit. Transit choices could include buses, light rail, dedicated shuttles, and trolleys. Since emissions from transit services already exist, the elimination of trip(s) from the automobile would result in emissions reductions.

URBEMIS determines emissions reductions from transit use based on a Transit Service Index, which is based on the latest California-specific research on transit use. The maximum reduction in trips/VMT and resulting emissions that may occur from this measure is calculated to be 15%.

Bicycle and Pedestrian Facilities

Emissions reductions from this measure would when an individual forgoes the use of the automobile and uses a bicycle or walks. Since the use of a bicycle or the action of walking does not emit emissions, the elimination of trip(s) from the automobile would result in emissions reductions. URBEMIS determines emissions reductions from bicycle use and pedestrian activities based on quantitative values of network density, sidewalk completeness and bike lane completeness. The maximum reduction in trips/VMT and resulting emissions that may occur from this measure is calculated to be 9%.

Affordable Housing/Senior Housing/ Assisted Living

This measure would reduce emissions by designating residential units as deed-restricted below-market-rate (BMR) housing. Research has shown that lower-income households and senior citizens own fewer vehicles and drive less. By designating residential units as deed-restricted BMR, only lower-income individuals that use the automobile less would occupy those units, which would result in lower emissions due to less automobile use. The maximum reduction in trips/VMT and resulting emissions and resulting emissions that may occur from this measure is calculated to be 4%.

Transportation Demand Management Programs

TDM Programs can include free transit passes, parking restrictions and telecommuting. Emissions reductions from this measure would occur when a landlord provides an incentive, such as transit passes, to individual(s), who then forgoes the use of the automobile and uses transit. These programs provide an incentive for the individual(s) to use the transit, and studies have show that these programs both increase transit ridership and reduce vehicle trips. The maximum reduction in trips/VMT and resulting emissions and resulting emissions that can be achieved under this measure is 25%.

Fleet Modifications

Reductions from this measure occur when a fleet owner makes vehicle specific modifications or agrees to purchase and/or use only vehicles with controls, such as a particulate filters or catalysts. There are numerous options available. The maximum reduction in emissions that can be achieved under this measure varies by control option.

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It is important to note that many of the mitigation listed above requires a change in travel behavior of an individual in order for the emissions reductions to occur. It is not guaranteed that the mitigation measures will be successful at changing travel behavior to the exact amount as calculated, however, it represents the best estimate/projection of what will occur based on the most recent research conducted on existing travel behavior to date.

B. Off-site Emissions Reductions

In the event that the emissions impact of a particular project is not fully mitigated on site a proportional fee will be assessed and collected for the NO_x and PM₁₀ emissions not mitigated. The fees collected would be placed into a mitigation fund for each pollutant and county, and expended on projects that reduce emissions of that pollutant in that county, utilizing a grant-like program. The district has over eleven years experience with grant programs designed to reduce primarily NO_x, and some VOC. Each grant program has had strict guidelines on emissions reductions, qualifying equipment, and the related administration of the program. Based on that experience, the District has decided that a grant program would provide the most cost-effective emissions reductions for the money that will be collected.

The District has employed the California Air Resources Board (ARB) and the California Department of Transportation document "*Methods to Find the Cost Effectiveness of Funding Air Quality Projects*" for finding the cost effectiveness and emission reduction benefits for a wide variety of emission reduction projects. This document can also be accessed through an associated on-line database. The methods described are generally accepted and include: a list of information needed to calculate cost effectiveness, emission factors, project life, defaults that may be used when project-specific data is not available (assumptions) and formulas to calculate vehicle emission reductions for three major pollutants, NO_x, PM₁₀, and VOC's. Many of those methods were used to develop the grant programs that could be funded under this program.

The most successful District grant program has been the Heavy-Duty Engine Incentive Program. This program replaces older model high polluting engines with newer and cleaner burning engines. Eligible project types funded under the heavy-duty program include, but are not limited to: on-road and off road vehicles and equipment, agricultural pump engines, marine vessels, forklifts, truck stop electrification technology, and school bus projects.

The Voluntary Accelerated Vehicle Retirement (Scrap) Program is designed to accelerate the voluntary retirement of older, higher polluting passenger vehicles. Monetary incentives are provided to individuals who agree to scrap their high polluting passenger vehicles. Ideally, this incentive money will help them purchase newer vehicles with cleaner burning engines.

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The Light and Medium Duty Vehicle Incentive Program is designed to encourage the purchase and use of cleaner engine technology for passenger vehicles. To be eligible under the program, the light and medium duty vehicles must be powered by natural gas, electricity, fuel cells, or gasoline-electric hybrid technology.

The Carl Moyer Program provides incentive funds for significant near-term reductions in NOx. Eligible project types under the Carl Moyer Program include: new alternative fuel vehicle projects, on and off-road vehicle engine replacement projects, agricultural pump engine replacements, locomotive engine replacements, marine vessels, forklifts, and airport ground support equipment engine replacements. Projects are funded based on cost effectiveness, utilizing criteria developed by the state in coordination with the air districts and the statewide Incentive Program Implementation Team (IPI).

In addition to the sources listed above, the District receives grant funds from other state and federal funding sources including: the State's Lower Emission School Bus Program, Peaker Plant Offset funds, and the State's NOx and PM Program funds.

IV. EMISSIONS REDUCTION OPTIONS FOR CONSTRUCTION

Construction PM10 emissions can be mitigated in numerous ways. The following discussion lists measures/conditions, if implemented that would result in emissions reductions from construction activities. The percent reduction identified was based on the URBEMIS2002 Users' Guide.

A. On-site Reduction Options

There are several on-site construction emissions reductions available. The following lists the current mitigation measures that reduce PM10 and NOx. There is a statewide effort to update the construction portion of URBEMIS, so there may be more mitigation measures identified that are not included in this appendix.

Equipment Exhaust Control

There are several options available for controlling NOx and PM10 emissions from equipment used for construction. Options can include, purchasing newer equipment, altering fuel usage, modifying an engine, using exhaust after-treatments, or renting equipment that help meet the rule requirements. New equipment can provide a high percentage of emissions reductions, depending on the horsepower and the year of the equipment. Reductions that can occur from using newer equipment reductions range from 8-62% for PM10, and 20-38% for NOx. Different fuels are available for use that would reduce emissions from construction equipment. Ultra-low sulfur diesel can achieve a 5-9% reduction in PM10. Alternative diesel fuels can achieve 5-16% reduction in NOx and a 40-63% reduction in PM10. Diesel oxidation catalysts can reduce PM10 by 25-50%. Diesel particulate filters can reduce PM10 by 85%. Selective Catalytic Reduction can reduce NOx by 80% and PM10 by 25%.

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Worker Commute Trip Reductions

This measure would entail using a shuttle to take construction workers to a retail establishment for lunch. This would eliminate numerous trips, which would reduce vehicle exhaust, and entrained and/or re-entrained road dust. The maximum PM10 reduction from this measure is 1.3%.

B. Off-site Reduction Options

Since any fees collected will reduce construction emissions off-site, the same emissions reduction options listed in section III above apply.

V. PROJECT-SPECIFIC EMISSIONS REDUCTIONS

Each development project, subject to Rule 9510, will have an assessment of the project performed. The assessment will include an APCO-approved model run that identifies the project or project phase baseline emissions and the emissions reduction resulting from on-site mitigation measures. The remaining emissions will be quantified and will fund emissions reduction project(s), using the fee formulas identified below.

Area and Operational NOx Fee Formula

The NOx fee formula must identify the total tonnage of mitigation required, subtract the tonnage mitigated on-site, and multiply the remaining tonnage by the cost of reductions in order to determine the cost to reduce emissions off-site.

Figure 3

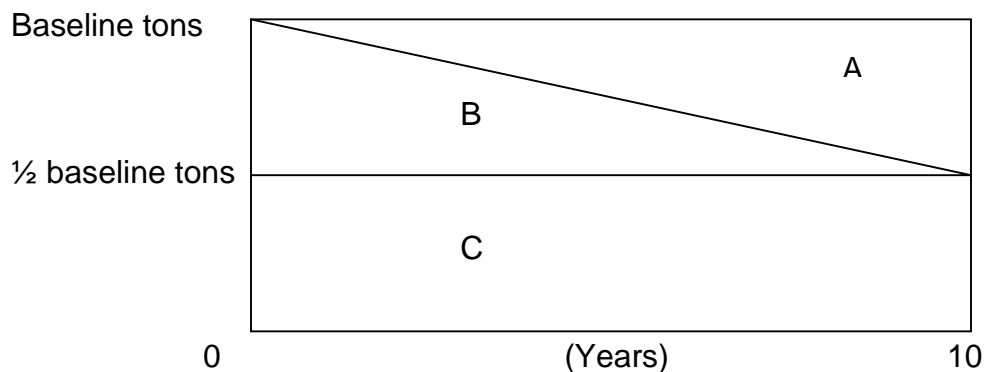


Figure 3 represents a development project's NOx emissions over a period of ten years. Section A represents the emissions reductions projected to be achieved from ARB's tailpipe control, which is 25% of the total project's 10 years emissions. The remaining 75% is the project's estimated NOx emissions for ten years. The mitigation required by Rule 9510 is represented by the triangle B, which equal to a third of the non-A section. Thus, the total tonnage of mitigation required can be identified as follows:

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$$\frac{\text{Estimated Baseline Emissions (tons)} \times 10 \text{ years} \times 75\%}{3}$$

which is equal to:

$$\text{EBE (tons)} \times 2.5$$

The next step is to subtract the percent reduction achieved from on-site mitigation measures. This is determined by using the estimated baseline emissions over ten years and applying the percent mitigation, as follows:

$$\begin{aligned} &\text{Estimated Baseline Emissions (tons)} \times 10 \text{ years} \times 75\% \times \text{Actual \% Mitigation} \\ &= \text{EBE} \times 7.5 \times \text{APM} \end{aligned}$$

Thus,

$$(\text{EBE} \times 2.5) - (\text{EBE} \times 7.5 \times \text{APM})$$

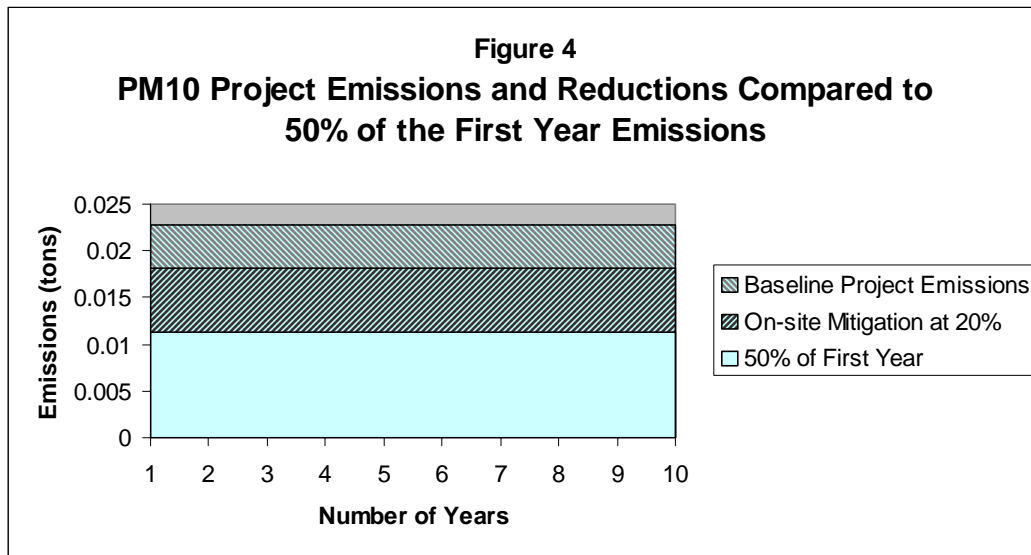
determines the total emissions remaining to mitigate off-site. That number then needs to be multiplied by dollars per ton, in order to determine total dollars required to mitigate emissions off-site. The resulting NOx Air Impact Mitigation Fee is as follows:

$$[(\text{EBE} \times 2.5) - (\text{EBE} \times 7.5 \times \text{APM})] \times [\text{Cost of NOx Reductions/ton}]$$

It is important to note that the percent reduction achieved onsite, results in a greater reduction of the NOx fee. While on-site mitigation is not required, the “bigger bang for the buck” is achieved with as much on-site mitigation as possible.

Area and Operational PM10 Fee Formula

The Air Impact Mitigation Fee for PM10 is more straightforward since a project’s PM10 emissions remain relatively constant over the life of the project. For ease of understanding, Figure 4 below demonstrates the relationship between baseline emissions, mitigated emissions and half of the baseline emissions.



The required PM10 mitigation is half of the baseline emissions for ten years. In order to determine the emissions that are subject to a fee, half of the baseline emissions need to be subtracted from the Mitigated Emissions and multiplied by cost of reductions in dollars per ton. Thus the resulting PM10 Air Impact Mitigation Fee is calculated as follows:

$$(\text{Mitigated PM10 emissions} - \frac{1}{2} \text{ Baseline PM10 emissions}) (\text{Cost of PM10 Reductions})$$

Construction Formulas

The Air Impact Mitigation Fees for construction are based on the project’s estimated construction equipment emissions, and compared to the statewide fleet average emissions. The required information is as follows: 1)a list of construction equipment used, 2)the model year, and 3)the hours estimated to be used is compiled, which can be determined from the National Construction Estimator or using project-specific information if known. Then the model specific emission factors are used to determine the actual estimated emissions (designated as AEE). The same hours are multiplied by a statewide average fleet emission factor for a particular year, to determine the statewide average estimated emissions (designated as SEE). Since the requirement is to reduce construction NOx emissions by 20% beyond the statewide average, this is determined as follows:

$$\begin{aligned} \text{NOx Construction} &= (\text{AEE}) - [(1.00 \times \text{SEE}) - (\text{SEE} \times 0.20)] \\ &= (\text{AEE}) - [1.00\text{SEE} - 0.20\text{SEE}] \\ &= (\text{AEE} - 0.8\text{SEE}) \end{aligned}$$

PM10 is almost identical, except that the requirement is to reduce construction PM10 emissions by 45% beyond the statewide average.

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$$\begin{aligned} \text{PM10 Construction} &= (\text{AEE}) - [(1.00 \times \text{SEE}) - (\text{SEE} \times 0.45)] \\ &= (\text{AEE}) - [1.00\text{SEE} - 0.45\text{SEE}] \\ &= (\text{AEE} - 0.55\text{SEE}) \end{aligned}$$

VI. EMISSIONS REDUCTIONS FROM RULE 9510

Both the 2003 PM10 Plan and the Extreme Ozone Attainment Demonstration Plan, contain emissions reduction commitments for proposed Rule 9510 of 4.1 tons per day of NOx and 5.2 tons per day of PM10 to be achieved by 2010. Those estimates were based on assumptions at the time and are commitments that are necessary to assist the district in meeting the federal and state PM10 and NOx standards. The methodology contained in this section and related attachments demonstrate the draft emission reductions for the program.

As part of determining the emissions reductions, sources that are exempt from the rule need to be subtracted out. The District has numerous years of experience in commenting on projects subject to CEQA. Based on that experience and the thresholds contained in Rule 9510, it is estimated that 15% of all development project emissions will be exempt from the provisions that rule. Attachment 2 and Attachment 3 identify the growth in emissions for each pollutant for each year, and subtract the emissions that will be exempt from the program. Once the emissions subject to the program are identified, the required mitigation is applied, which is 33.3% of baseline NOx emissions over ten years, 50% of baseline operational PM10 emissions over ten years, 20% of construction NOx emissions and 45% of construction PM10 emissions. The reductions achieved on-site were calculated by multiplying the estimated percent of sources opting to use on-site measures, the percent reduction achieved on-site, by the baseline emissions. Off-site reductions were estimated differently. Since grant programs typically rely on project life to determine cost effectiveness and emissions reductions, the reduction was divided by the average project life for that pollutant's cost-effectiveness, which is 7 years for NOx and 12 years for PM10, and spread out over that number of years. Attachment 2 and 3 contain the detailed emission reductions calculations. The results of those calculations reveal that the program, as currently defined, will result in reductions of 5.4 tons per day of NOx in 2010 and 5.8 tons per day of PM10 in 2010.

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Attachment 1 - Emissions and Growth in Emissions from Motor Vehicles

Passenger Cars						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	46,763,000	1,186,080	27.53	25.64	1.69	282.88
CY 2007	48,037,000	1,215,840	25.06	23.34	1.73	260.25
CY2008	49,324,000	1,246,060	22.80	21.26	1.77	239.16
CY2009	50,625,000	1,276,970	20.74	19.32	1.81	219.49
CY2010	51,952,000	1,308,670	18.80	17.52	1.85	200.89
CY2011	53,253,000	1,340,690	17.11	15.87	1.90	184.01
CY2012	54,544,000	1,373,190	15.61	14.39	1.94	168.64
CY2013	55,835,000	1,406,290	14.28	13.07	1.99	154.78
CY2014	57,127,000	1,440,000	13.12	11.89	2.04	142.42
CY2015	58,427,000	1,474,400	12.12	10.85	2.08	131.38
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	46,763,000	1,186,080	27.53	25.64	1.69	282.88
CY 2007	46,817,000	1,184,970	23.52	21.39	1.68	242.70
CY2008	46,857,000	1,183,740	20.86	18.97	1.68	217.58
CY2009	46,878,000	1,182,430	18.52	16.81	1.67	194.91
CY2010	46,885,000	1,181,030	16.38	14.86	1.67	174.13
CY2011	46,849,000	1,179,460	14.55	13.13	1.67	155.73
CY2012	46,784,000	1,177,840	12.96	11.61	1.67	139.41
CY2013	46,702,000	1,176,250	11.58	10.29	1.66	125.00
CY2014	46,601,000	1,174,680	10.39	9.13	1.66	112.39
CY2015	46,487,000	1,173,100	9.37	8.14	1.66	101.32
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	1,220,000	30,870	1.54	1.95	0.05	17.55
CY2008	2,467,000	62,320	1.94	2.29	0.09	21.58
CY2009	3,747,000	94,540	2.22	2.51	0.14	24.58
CY2010	5,067,000	127,640	2.42	2.66	0.18	26.76
CY2011	6,404,000	161,230	2.56	2.74	0.23	28.28
CY2012	7,760,000	195,350	2.65	2.78	0.27	29.23
CY2013	9,133,000	230,040	2.70	2.78	0.33	29.78
CY2014	10,526,000	265,320	2.73	2.76	0.38	30.03
CY2015	11,940,000	301,300	2.75	2.71	0.42	30.06

Light-Duty Truck (GVWR < 3,751 lbs)						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	19,277,000	504,871	16.65	16.97	0.75	191.39
CY 2007	19,879,000	518,651	15.59	15.63	0.77	177.66

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CY2008	20,503,000	532,766	14.54	14.39	0.78	164.45
CY2009	21,148,000	547,300	13.50	13.21	0.80	151.41
CY2010	21,810,000	562,308	12.50	12.10	0.82	138.99
CY2011	22,456,000	577,812	11.70	11.10	0.84	128.18
CY2012	23,103,000	593,638	10.97	10.22	0.86	118.33
CY2013	23,754,000	609,742	10.27	9.41	0.88	109.08
CY2014	24,410,000	626,177	9.61	8.68	0.90	100.56
CY2015	25,072,000	642,987	9.02	8.01	0.93	92.73
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	19,277,000	504,871	16.65	16.97	0.75	191.39
CY 2007	19,374,000	505,480	14.54	14.03	0.75	163.40
CY2008	19,478,000	506,121	13.21	12.57	0.74	147.26
CY2009	19,582,000	506,782	11.96	11.22	0.74	132.09
CY2010	19,683,000	507,465	10.80	10.01	0.74	118.19
CY2011	19,756,000	508,326	9.87	8.96	0.74	106.40
CY2012	19,816,000	509,186	9.04	8.04	0.74	95.88
CY2013	19,869,000	510,001	8.26	7.22	0.74	86.35
CY2014	19,912,000	510,803	7.55	6.49	0.74	77.79
CY2015	19,949,000	511,590	6.93	5.86	0.74	70.11
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	505,000	13,171	1.05	1.60	0.02	14.26
CY2008	1,025,000	26,645	1.33	1.82	0.04	17.19
CY2009	1,566,000	40,518	1.54	1.99	0.06	19.32
CY2010	2,127,000	54,843	1.70	2.09	0.08	20.80
CY2011	2,700,000	69,486	1.83	2.14	0.10	21.78
CY2012	3,287,000	84,452	1.93	2.18	0.12	22.45
CY2013	3,885,000	99,741	2.01	2.19	0.14	22.73
CY2014	4,498,000	115,374	2.06	2.19	0.16	22.77
CY2015	5,123,000	131,397	2.09	2.15	0.19	22.62

Light-Duty Truck (GVWR 3,751 to 5,750 lbs)

Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	14,206,000	363,542	11.60	15.81	0.74	133.05
CY 2007	14,550,000	373,494	11.03	14.80	0.76	125.36
CY2008	14,919,000	383,713	10.48	13.85	0.78	117.89
CY2009	15,308,000	394,213	9.95	12.93	0.80	110.66
CY2010	15,718,000	405,048	9.44	12.05	0.83	103.67
CY2011	16,150,000	416,094	8.90	11.17	0.85	96.52
CY2012	16,591,000	427,382	8.39	10.34	0.87	89.90
CY2013	17,045,000	438,884	7.89	9.56	0.90	83.57
CY2014	17,507,000	450,596	7.40	8.83	0.92	77.55
CY2015	17,972,000	462,557	6.97	8.16	0.95	72.09

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Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	14,206,000	363,542	11.60	15.81	0.74	133.05
CY 2007	14,180,000	364,010	10.37	13.49	0.74	116.90
CY2008	14,173,000	364,523	9.61	12.29	0.74	107.14
CY2009	14,175,000	365,028	8.90	11.17	0.74	98.08
CY2010	14,185,000	365,543	8.25	10.14	0.74	89.63
CY2011	14,208,000	366,056	7.59	9.16	0.75	81.45
CY2012	14,230,000	366,582	6.99	8.27	0.75	74.06
CY2013	14,257,000	367,092	6.42	7.46	0.75	67.24
CY2014	14,281,000	367,573	5.87	6.72	0.75	60.96
CY2015	14,300,000	368,032	5.41	6.06	0.75	55.36
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	370,000	9,484	0.66	1.31	0.02	8.46
CY2008	746,000	19,190	0.87	1.56	0.04	10.75
CY2009	1,133,000	29,185	1.05	1.76	0.06	12.58
CY2010	1,533,000	39,505	1.19	1.91	0.09	14.04
CY2011	1,942,000	50,038	1.31	2.01	0.10	15.07
CY2012	2,361,000	60,800	1.40	2.07	0.12	15.84
CY2013	2,788,000	71,792	1.47	2.10	0.15	16.33
CY2014	3,226,000	83,023	1.53	2.11	0.17	16.59
CY2015	3,672,000	94,525	1.56	2.10	0.20	16.73

Medium-Duty Truck (GVWR 5,751 to 8,500 lbs)						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	5,521,000	141,790	5.01	7.94	0.29	57.52
CY 2007	5,679,000	146,113	4.79	7.46	0.30	54.45
CY2008	5,844,000	150,494	4.57	7.00	0.31	51.57
CY2009	6,017,000	155,025	4.36	6.56	0.32	48.81
CY2010	6,196,000	159,717	4.16	6.15	0.33	46.11
CY2011	6,369,000	164,373	3.96	5.74	0.33	43.46
CY2012	6,547,000	169,143	3.77	5.35	0.34	40.99
CY2013	6,728,000	174,015	3.60	4.99	0.36	38.71
CY2014	6,914,000	178,995	3.44	4.65	0.37	36.65
CY2015	7,105,000	184,102	3.29	4.34	0.38	34.70
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	5,521,000	141,790	5.01	7.94	0.29	57.52
CY 2007	5,535,000	142,403	4.47	6.84	0.29	50.71
CY2008	5,552,000	142,967	4.16	6.25	0.29	46.84
CY2009	5,571,000	143,548	3.87	5.71	0.29	43.19
CY2010	5,591,000	144,140	3.60	5.20	0.29	39.82
CY2011	5,603,000	144,606	3.35	4.73	0.29	36.65
CY2012	5,615,000	145,080	3.12	4.30	0.30	33.75

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CY2013	5,628,000	145,550	2.91	3.91	0.30	31.12
CY2014	5,640,000	146,015	2.72	3.55	0.30	28.80
CY2015	5,653,000	146,480	2.54	3.24	0.30	26.65
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	144,000	3,710	0.32	0.62	0.01	3.74
CY2008	292,000	7,527	0.41	0.75	0.02	4.73
CY2009	446,000	11,477	0.49	0.85	0.03	5.62
CY2010	605,000	15,577	0.56	0.95	0.04	6.29
CY2011	766,000	19,767	0.61	1.01	0.04	6.81
CY2012	932,000	24,063	0.65	1.05	0.04	7.24
CY2013	1,100,000	28,465	0.69	1.08	0.06	7.59
CY2014	1,274,000	32,980	0.72	1.10	0.07	7.85
CY2015	1,452,000	37,622	0.75	1.10	0.08	8.05

Light Heavy-Duty Truck (GVWR 8,501 to 10,000 lbs)

Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	2,281,000	34,879	2.13	5.00	0.12	12.85
CY 2007	2,304,000	35,651	1.96	4.95	0.12	11.55
CY2008	2,321,000	36,449	1.84	4.89	0.13	10.52
CY2009	2,334,000	37,270	1.74	4.84	0.13	9.70
CY2010	2,344,000	38,123	1.68	4.71	0.13	9.01
CY2011	2,351,000	38,998	1.65	4.58	0.13	8.49
CY2012	2,356,000	39,887	1.63	4.46	0.13	8.06
CY2013	2,362,000	40,784	1.63	4.34	0.13	7.67
CY2014	2,371,000	41,696	1.63	4.23	0.13	7.34
CY2015	2,384,000	42,634	1.64	4.13	0.13	7.04
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	2,281,000	34,879	2.13	5.00	0.12	12.85
CY 2007	2,246,000	34,746	1.91	4.82	0.12	11.24
CY2008	2,205,000	34,626	1.74	4.64	0.12	9.99
CY2009	2,161,000	34,511	1.61	4.48	0.12	8.97
CY2010	2,115,000	34,405	1.51	4.24	0.12	8.13
CY2011	2,068,000	34,309	1.45	4.02	0.11	7.46
CY2012	2,021,000	34,213	1.40	3.82	0.11	6.91
CY2013	1,976,000	34,113	1.36	3.63	0.11	6.42
CY2014	1,934,000	34,014	1.33	3.45	0.11	5.98
CY2015	1,897,000	33,921	1.31	3.28	0.10	5.60

Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	58,000	905	0.05	0.13	0.00	0.31
CY2008	116,000	1,823	0.10	0.25	0.01	0.53
CY2009	173,000	2,759	0.13	0.36	0.01	0.73

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CY2010	229,000	3,718	0.17	0.47	0.01	0.88
CY2011	283,000	4,689	0.20	0.56	0.02	1.03
CY2012	335,000	5,674	0.23	0.64	0.02	1.15
CY2013	386,000	6,671	0.27	0.71	0.02	1.25
CY2014	437,000	7,682	0.30	0.78	0.02	1.36
CY2015	487,000	8,713	0.33	0.85	0.03	1.44

Light Heavy-Duty Truck (GVWR 10,001 to 14,000 lbs)						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	624,000	10,645	0.76	2.78	0.06	4.45
CY 2007	626,000	10,885	0.75	2.67	0.05	4.18
CY2008	630,000	11,133	0.74	2.57	0.05	3.93
CY2009	637,000	11,387	0.72	2.47	0.05	3.67
CY2010	645,000	11,651	0.70	2.33	0.05	3.42
CY2011	653,000	11,922	0.68	2.19	0.05	3.18
CY2012	664,000	12,200	0.66	2.06	0.05	2.98
CY2013	674,000	12,484	0.64	1.93	0.05	2.79
CY2014	686,000	12,773	0.62	1.81	0.05	2.63
CY2015	699,000	13,071	0.60	1.70	0.05	2.46
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	624,000	10,645	0.76	2.78	0.06	4.45
CY 2007	611,000	10,609	0.73	2.60	0.05	4.07
CY2008	599,000	10,576	0.70	2.43	0.05	3.73
CY2009	590,000	10,544	0.67	2.29	0.05	3.40
CY2010	582,000	10,514	0.63	2.10	0.05	3.09
CY2011	575,000	10,489	0.60	1.92	0.04	2.80
CY2012	569,000	10,465	0.56	1.76	0.04	2.56
CY2013	564,000	10,442	0.53	1.61	0.04	2.34
CY2014	560,000	10,420	0.50	1.48	0.04	2.15
CY2015	556,000	10,400	0.47	1.35	0.04	1.96
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	15,000	276	0.02	0.07	0.00	0.11
CY2008	31,000	557	0.04	0.14	0.00	0.20
CY2009	47,000	843	0.05	0.18	0.00	0.27
CY2010	63,000	1,137	0.07	0.23	0.00	0.33
CY2011	78,000	1,433	0.08	0.27	0.01	0.38
CY2012	95,000	1,735	0.10	0.30	0.01	0.42
CY2013	110,000	2,042	0.11	0.32	0.01	0.45
CY2014	126,000	2,353	0.12	0.33	0.01	0.48
CY2015	143,000	2,671	0.13	0.35	0.01	0.50

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Medium Heavy-Duty Truck (GVWR 14,001 to 33,000 lbs)						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	1,844,000	32,324	4.23	20.26	0.61	31.38
CY 2007	1,897,000	33,004	3.94	19.34	0.58	29.10
CY2008	1,951,000	33,694	3.69	18.42	0.57	27.07
CY2009	2,005,000	34,411	3.45	17.53	0.56	25.24
CY2010	2,058,000	35,155	3.22	16.29	0.54	23.47
CY2011	2,113,000	35,925	3.00	15.10	0.52	21.80
CY2012	2,168,000	36,711	2.79	13.96	0.50	20.22
CY2013	2,223,000	37,512	2.60	12.87	0.49	18.77
CY2014	2,279,000	38,329	2.40	11.85	0.48	17.36
CY2015	2,334,000	39,167	2.23	10.88	0.46	16.05
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	1,844,000	32,324	4.23	20.26	0.61	31.38
CY 2007	1,849,000	32,166	3.83	18.83	0.56	28.33
CY2008	1,853,000	32,009	3.49	17.48	0.54	25.68
CY2009	1,856,000	31,864	3.19	16.21	0.52	23.34
CY2010	1,857,000	31,726	2.90	14.68	0.49	21.15
CY2011	1,859,000	31,605	2.64	13.27	0.46	19.15
CY2012	1,860,000	31,488	2.39	11.96	0.43	17.32
CY2013	1,859,000	31,376	2.17	10.76	0.41	15.68
CY2014	1,859,000	31,267	1.96	9.65	0.39	14.15
CY2015	1,857,000	31,163	1.77	8.65	0.37	12.76
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	48,000	838	0.11	0.51	0.02	0.77
CY2008	98,000	1,685	0.20	0.94	0.03	1.39
CY2009	149,000	2,547	0.26	1.32	0.04	1.90
CY2010	201,000	3,429	0.32	1.61	0.05	2.32
CY2011	254,000	4,320	0.36	1.83	0.06	2.65
CY2012	308,000	5,223	0.40	2.00	0.07	2.90
CY2013	364,000	6,136	0.43	2.11	0.08	3.09
CY2014	420,000	7,062	0.44	2.20	0.09	3.21
CY2015	477,000	8,004	0.46	2.23	0.09	3.29

Heavy Heavy-Duty Truck (GVWR 33,001 to 60,000 lbs)						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	4,845,000	31,643	6.00	82.30	1.85	44.21
CY 2007	4,978,000	32,260	5.70	78.05	1.72	41.00
CY2008	5,123,000	32,896	5.44	73.87	1.65	38.44
CY2009	5,281,000	33,555	5.18	69.88	1.60	36.18
CY2010	5,449,000	34,235	4.90	64.43	1.52	33.93
CY2011	5,628,000	34,939	4.64	59.06	1.44	31.99

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CY2012	5,817,000	35,648	4.39	53.91	1.37	30.10
CY2013	6,019,000	36,370	4.13	49.01	1.31	28.31
CY2014	6,235,000	37,118	3.91	44.50	1.26	26.84
CY2015	6,451,000	37,891	3.68	40.44	1.22	25.19
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	4,845,000	31,643	6.00	82.30	1.85	44.21
CY 2007	4,852,000	31,440	5.49	75.87	1.67	39.47
CY2008	4,866,000	31,251	5.10	69.98	1.57	36.07
CY2009	4,890,000	31,071	4.73	64.51	1.48	33.09
CY2010	4,918,000	30,896	4.37	57.97	1.37	30.23
CY2011	4,951,000	30,738	4.03	51.80	1.27	27.78
CY2012	4,989,000	30,577	3.71	46.09	1.18	25.48
CY2013	5,034,000	30,420	3.41	40.86	1.10	23.37
CY2014	5,086,000	30,279	3.15	36.19	1.03	21.61
CY2015	5,133,000	30,148	2.90	32.08	0.97	19.78
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	126,000	820	0.21	2.18	0.05	1.53
CY2008	257,000	1,645	0.34	3.89	0.08	2.37
CY2009	391,000	2,484	0.45	5.37	0.12	3.09
CY2010	531,000	3,339	0.53	6.46	0.15	3.70
CY2011	677,000	4,201	0.61	7.26	0.17	4.21
CY2012	828,000	5,071	0.68	7.82	0.19	4.62
CY2013	985,000	5,950	0.72	8.15	0.21	4.94
CY2014	1,149,000	6,839	0.76	8.31	0.23	5.23
CY2015	1,318,000	7,743	0.78	8.36	0.25	5.41

School Bus						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	186,000	3,982	0.32	2.54	0.10	3.59
CY 2007	190,000	4,082	0.31	2.57	0.10	3.39
CY2008	195,000	4,185	0.31	2.60	0.10	3.35
CY2009	200,000	4,290	0.31	2.63	0.10	3.26
CY2010	205,000	4,398	0.31	2.65	0.10	3.22
CY2011	210,000	4,512	0.31	2.67	0.10	3.19
CY2012	216,000	4,627	0.32	2.66	0.10	3.15
CY2013	221,000	4,743	0.31	2.64	0.10	3.03
CY2014	227,000	4,861	0.31	2.62	0.10	2.93
CY2015	232,000	4,981	0.31	2.60	0.10	2.81
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	186,000	3,982	0.32	2.54	0.10	3.59
CY 2007	185,000	3,978	0.30	2.50	0.10	3.30
CY2008	185,000	3,975	0.29	2.47	0.10	3.17

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CY2009	185,000	3,972	0.29	2.43	0.09	3.01
CY2010	185,000	3,969	0.28	2.39	0.09	2.90
CY2011	185,000	3,969	0.28	2.34	0.09	2.80
CY2012	185,000	3,968	0.27	2.27	0.09	2.69
CY2013	185,000	3,967	0.26	2.20	0.09	2.53
CY2014	185,000	3,966	0.25	2.13	0.08	2.39
CY2015	185,000	3,963	0.24	2.06	0.08	2.23
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	5,000	104	0.01	0.07	0.00	0.09
CY2008	10,000	210	0.02	0.13	0.00	0.18
CY2009	15,000	318	0.02	0.20	0.01	0.25
CY2010	20,000	429	0.03	0.26	0.01	0.32
CY2011	25,000	543	0.03	0.33	0.01	0.39
CY2012	31,000	659	0.05	0.39	0.01	0.46
CY2013	36,000	776	0.05	0.44	0.01	0.50
CY2014	42,000	895	0.06	0.49	0.02	0.54
CY2015	47,000	1,018	0.07	0.54	0.02	0.58

Urban Bus						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	330,000	2,407	1.30	4.70	0.08	11.25
CY 2007	338,000	2,468	1.29	4.69	0.08	11.08
CY2008	347,000	2,531	1.28	4.68	0.08	10.88
CY2009	356,000	2,595	1.28	4.67	0.08	10.78
CY2010	365,000	2,661	1.27	4.66	0.08	10.55
CY2011	374,000	2,730	1.27	4.64	0.08	10.29
CY2012	384,000	2,800	1.26	4.56	0.08	9.87
CY2013	393,000	2,870	1.26	4.54	0.08	9.41
CY2014	403,000	2,942	1.26	4.44	0.08	9.05
CY2015	413,000	3,014	1.25	4.40	0.08	8.47
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	330,000	2,407	1.30	4.70	0.08	11.25
CY 2007	330,000	2,406	1.25	4.56	0.07	10.78
CY2008	329,000	2,404	1.21	4.44	0.07	10.32
CY2009	329,000	2,403	1.17	4.31	0.07	9.97
CY2010	329,000	2,402	1.14	4.19	0.07	9.51
CY2011	329,000	2,402	1.11	4.07	0.07	9.04
CY2012	329,000	2,401	1.07	3.90	0.07	8.45
CY2013	329,000	2,401	1.04	3.79	0.06	7.86
CY2014	329,000	2,400	1.02	3.61	0.06	7.37
CY2015	329,000	2,398	0.98	3.49	0.06	6.72

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

Appendix B: Emissions Reduction Analysis for Rule 9510 and 3180

December 15, 2005

Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	8,000	62	0.04	0.13	0.01	0.30
CY2008	18,000	127	0.07	0.24	0.01	0.56
CY2009	27,000	192	0.11	0.36	0.01	0.81
CY2010	36,000	259	0.13	0.47	0.01	1.04
CY2011	45,000	328	0.16	0.57	0.01	1.25
CY2012	55,000	399	0.19	0.66	0.01	1.42
CY2013	64,000	469	0.22	0.75	0.02	1.55
CY2014	74,000	542	0.24	0.83	0.02	1.68
CY2015	84,000	616	0.27	0.91	0.02	1.75

Motorhome						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	531,000	34,851	0.84	2.04	0.03	21.00
CY 2007	552,000	36,150	0.80	2.01	0.03	19.78
CY2008	574,000	37,508	0.75	1.97	0.03	18.26
CY2009	598,000	38,927	0.70	1.93	0.03	16.91
CY2010	624,000	40,417	0.66	1.86	0.03	15.57
CY2011	651,000	42,003	0.60	1.79	0.03	14.09
CY2012	679,000	43,650	0.56	1.72	0.03	12.73
CY2013	709,000	45,360	0.50	1.63	0.04	11.26
CY2014	741,000	47,134	0.45	1.54	0.04	9.86
CY2015	772,000	48,973	0.40	1.46	0.04	8.67
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	531,000	34,851	0.84	2.04	0.03	21.00
CY 2007	538,000	35,232	0.78	1.95	0.03	19.27
CY2008	546,000	35,632	0.71	1.87	0.03	17.33
CY2009	554,000	36,045	0.65	1.78	0.03	15.65
CY2010	563,000	36,475	0.59	1.68	0.03	14.04
CY2011	573,000	36,951	0.53	1.57	0.03	12.39
CY2012	583,000	37,440	0.48	1.47	0.03	10.92
CY2013	593,000	37,940	0.42	1.36	0.03	9.41
CY2014	604,000	38,449	0.37	1.25	0.03	8.04
CY2015	615,000	38,965	0.32	1.15	0.03	6.89

Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	14,000	918	0.02	0.06	0.00	0.51
CY2008	28,000	1,876	0.04	0.10	0.00	0.93
CY2009	44,000	2,882	0.05	0.15	0.00	1.26
CY2010	61,000	3,942	0.07	0.18	0.00	1.53
CY2011	78,000	5,052	0.07	0.22	0.00	1.70
CY2012	96,000	6,210	0.08	0.25	0.00	1.81
CY2013	116,000	7,420	0.08	0.27	0.01	1.85

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Appendix B: Emissions Reduction Analysis for Rule 9510 and 3180

December 15, 2005

CY2014	137,000	8,685	0.08	0.29	0.01	1.82
CY2015	157,000	10,008	0.08	0.31	0.01	1.78

Motorcycle						
Total - Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	342,000	38,680	2.17	0.55	0.02	20.14
CY 2007	352,000	39,251	2.14	0.57	0.03	20.42
CY2008	361,000	39,854	2.06	0.57	0.02	19.23
CY2009	369,000	40,483	1.99	0.56	0.02	18.12
CY2010	376,000	41,132	1.93	0.56	0.02	17.19
CY2011	383,000	41,807	1.88	0.56	0.02	16.31
CY2012	389,000	42,499	1.85	0.56	0.02	15.62
CY2013	395,000	43,204	1.83	0.56	0.02	15.05
CY2014	401,000	43,920	1.81	0.57	0.02	14.58
CY2015	408,000	44,655	1.80	0.57	0.02	14.21
Total - No Growth						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2006	342,000	38,680	2.17	0.55	0.02	20.14
CY 2007	343,000	38,255	2.08	0.55	0.02	19.89
CY2008	343,000	37,861	1.95	0.54	0.02	18.27
CY2009	342,000	37,486	1.84	0.52	0.02	16.79
CY2010	339,000	37,121	1.74	0.51	0.02	15.52
CY2011	337,000	36,780	1.66	0.49	0.02	14.37
CY2012	333,000	36,453	1.59	0.48	0.02	13.42
CY2013	330,000	36,136	1.53	0.47	0.02	12.61
CY2014	327,000	35,827	1.48	0.46	0.02	11.91
CY2015	324,000	35,529	1.43	0.45	0.02	11.32
Total - Difference						
	VMT	Pop	ROG	NOx	PM10	CO
CY 2007	9,000	996	0.06	0.02	0.01	0.53
CY2008	18,000	1,993	0.11	0.03	0.00	0.96
CY2009	27,000	2,997	0.15	0.04	0.00	1.33
CY2010	37,000	4,011	0.19	0.05	0.00	1.67
CY2011	46,000	5,027	0.22	0.07	0.00	1.94
CY2012	56,000	6,046	0.26	0.08	0.00	2.20
CY2013	65,000	7,068	0.30	0.09	0.00	2.44
CY2014	74,000	8,093	0.33	0.11	0.00	2.67
CY2015	84,000	9,126	0.37	0.12	0.00	2.89

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

**Attachment 2
NOx Emissions and Emissions Reductions**

Emission Inventory Category	NOx Emissions (tons per day)									
	2006	2007	2008	2009	2010	2011	2012	2013	2014	
Total Growth in Motor Vehicle Emissions ^A	0.0	8.3	11.6	14.3	16.4	17.9	19.0	19.8	20.2	
Total Annual Growth in Motor Vehicles Emissions ^A	0.0	8.3	3.2	2.7	2.1	1.5	1.1	0.7	0.5	
Rule Penetration (tpd) ^B	0.0	7.1	2.7	2.3	1.8	1.3	1.0	0.6	0.4	
On-Site Reductions										
Estimated Sources to perform on-site reductions ^C	40%	45%	50%	55%	60%	65%	70%	70%	70%	
Average Mitigation achieved on-site (%) ^C	7%	9%	11%	13%	14%	15%	15%	15%	15%	
Reductions from 2006 Development	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Reductions from 2007 Development		0.3	0.3	0.3	0.2	0.2	0.2	0.2	0.2	
Reductions from 2008 Development			0.2	0.1	0.1	0.1	0.1	0.1	0.1	
Reductions from 2009 Development				0.2	0.2	0.1	0.1	0.1	0.1	
Reductions from 2010 Development					0.1	0.1	0.1	0.1	0.1	
Reductions from 2011 Development						0.1	0.1	0.1	0.1	
Reductions from 2012 Development							0.1	0.1	0.1	
Reductions from 2013 Development								0.1	0.1	
Reductions from 2014 Development									0.0	
Total On-site Reductions^D	0.0	0.3	0.4	0.6	0.7	0.8	0.8	0.8	0.8	
Off-site Reductions										
Remaining Subject Emissions ^E	0.0	6.8	2.6	2.2	1.6	1.2	0.9	0.5	0.4	
Reductions from 2006 Development	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Reductions from 2007 Development		2.4	2.4	2.4	2.4	2.4	2.4	2.4		
Reductions from 2008 Development			0.9	0.9	0.9	0.9	0.9	0.9	0.9	
Reductions from 2009 Development				0.8	0.8	0.8	0.8	0.8	0.8	
Reductions from 2010 Development					0.6	0.6	0.6	0.6	0.6	
Reductions from 2011 Development						0.4	0.4	0.4	0.4	
Reductions from 2012 Development							0.3	0.3	0.3	
Reductions from 2013 Development								0.2	0.2	
Reductions from 2014 Development									0.1	
Total Off-site Reductions^F	0.0	2.4	3.4	4.1	4.7	5.1	5.4	5.6	3.3	
Total Reductions	0.0	2.7	3.8	4.7	5.4	5.9	6.3	6.5	4.2	

A. ARB performed an EMFAC2002 model run that estimated the growth between 2006 and 2015 (Attachment 1).

Since this analysis needs growth per year, the current year's emissions are subtracted by the previous year's emissions to obtain the annual growth.

Medium-Heavy and Heavy-Heavy Duty emissions have been reduced by 12% to account for through-valley traffic

B. Rule penetration is estimated to be 85% based on District experience with CEQA projects.

C. Staff estimate

D. Determined by multiplying rule penetration of operational emissions, estimated sources to perform on-site reductions, average mitigation achieved on-site, and adding the reductions for each year

E. Determined by subtracting a particular years on-site reduction from the Rule Penetration of Operational Emissions for that year.

F. Determined by multiplying Remaining Subject Emissions with 250%, and dividing by 7 to account for the average project life of the estimated emission reduction projects.

G. The rule requires mitigation of 250% of the first years emissions. That total was then divided by 7 to account for the average project life of the estimated emission reduction projects.

On-Site reductions are reduced over time to account for the reduction in mobile emissions

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Appendix B: Emissions Reduction Analysis for Rule 9510 and 3180

December 15, 2005

**Attachment 3
PM10 Emissions and Emissions Reductions**

EMISSIONS INVENTORY CATEGORY	ANNUAL GROWTH IN PM10 EMISSIONS (tons per day) ^A									
	2006	2007	2008	2009	2010	2011	2012	2013	2014	
Operational PM10 Emissions										
Re-entrained Paved Road Dust ^B :										
Freeway	0.4	0.4	0.4	0.3	0.3	0.3	0.3	0.3	0.3	0.3
Collector Streets	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Major Streets	0.4	0.4	0.4	0.4	0.4	0.5	0.5	0.5	0.5	0.5
Local Streets	0.2	0.2	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Rural Streets	0.4	0.4	0.4	0.4	0.4	0.5	0.5	0.5	0.5	0.5
On-road vehicles ^C	0.0	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Total Annual Growth in Operational PM10 Emissions	1.1	1.2	1.1	1.3	1.3	1.5	1.5	1.5	1.5	1.5
Cumulative Growth in Operational PM10 Emissions ^D	1.1	2.3	3.4	4.7	6.0	7.5	9.1	10.6	12.2	
Rule Penetration of Operational Emissions (tpd) ^E	0.9	1.0	1.0	1.1	1.1	1.3	1.3	1.3	1.3	1.3
On-site Reductions										
Estimated Sources to perform on-site reductions ^F	40%	45%	50%	55%	60%	65%	70%	70%	70%	70%
Average Mitigation achieved on-site (%) ^F	7%	9%	11%	13%	14%	15%	15%	15%	15%	15%
Reductions from 2006 Development	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03
Reductions from 2007 Development		0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
Reductions from 2008 Development			0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Reductions from 2009 Development				0.08	0.08	0.08	0.08	0.08	0.08	0.08
Reductions from 2010 Development					0.09	0.09	0.09	0.09	0.09	0.09
Reductions from 2011 Development						0.13	0.13	0.13	0.13	0.13
Reductions from 2012 Development							0.14	0.14	0.14	0.14
Reductions from 2013 Development								0.14	0.14	0.14
Reductions from 2014 Development									0.14	0.14
Total On-site Reductions (tpd)^G	0.0	0.1	0.1	0.2	0.3	0.4	0.6	0.7	0.8	0.8
Off-site Reductions										
Remaining Subject Emissions ^H	0.9	1.0	0.9	1.0	1.0	1.2	1.2	1.2	1.2	1.2
Reductions from 2006 Development	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Reductions from 2007 Development		0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Reductions from 2008 Development			0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Reductions from 2009 Development				0.4	0.4	0.4	0.4	0.4	0.4	0.4
Reductions from 2010 Development					0.4	0.4	0.4	0.4	0.4	0.4
Reductions from 2011 Development						0.5	0.5	0.5	0.5	0.5
Reductions from 2012 Development							0.5	0.5	0.5	0.5
Reductions from 2013 Development								0.5	0.5	0.5
Reductions from 2014 Development									0.5	0.5
Total Off-site Reductions^I	0.4	0.8	1.2	1.6	2.0	2.5	3.0	3.5	4.0	4.0
Total Operational PM10 Reductions^J	0.4	0.9	1.3	1.8	2.3	2.9	3.5	4.2	4.8	4.8

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See footnotes on following pages.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

EMISSIONS INVENTORY CATEGORY	ANNUAL EMISSIONS (tons per day) ^K									
	2006	2007	2008	2009	2010	2011	2012	2013	2014	
Construction Equipment Emissions										
Total Construction Equipment NOx Emissions ^L	26.9	25.5	24.1	22.7	21.3	20.1	18.9	17.6	16.4	
Construction Equipment PM10 Equivalent ^M	17.9	17.0	16.1	15.1	14.2	13.4	12.6	11.7	10.9	
Rule Penetration of Construction Equipment Emissions (tpd) ^E	15.2	14.4	13.7	12.9	12.1	11.4	10.7	10.0	9.3	
On-site Reductions										
Estimated Sources to perform fleet reductions (%) ^F	10%	20%	30%	40%	50%	50%	50%	50%	50%	
Average Fleet Reductions (%) ^N	20%	20%	20%	20%	20%	20%	20%	20%	20%	
Construction Fleet Reductions^G	0.3	0.6	0.8	1.0	1.2	1.1	1.1	1.0	0.9	
Off-site Reductions										
Remaining Emissions (tpd) ⁴	14.9	13.9	12.8	11.8	10.9	10.3	9.6	9.0	8.4	
Reductions from 2006 Development	0.4	0.4	0.4	0.4	0.4	0.4	0.4			
Reductions from 2007 Development		0.4	0.4	0.4	0.4	0.4	0.4	0.4		
Reductions from 2008 Development			0.4	0.4	0.4	0.4	0.4	0.4	0.4	
Reductions from 2009 Development				0.3	0.3	0.3	0.3	0.3	0.3	
Reductions from 2010 Development					0.3	0.3	0.3	0.3	0.3	
Reductions from 2011 Development						0.3	0.3	0.3	0.3	
Reductions from 2012 Development							0.3	0.3	0.3	
Reductions from 2013 Development								0.3	0.3	
Reductions from 2014 Development									0.2	
Total Off-site Reductions^O	0.4	0.8	1.2	1.5	1.8	2.1	2.4	2.2	2.1	
Construction Equipment Reductions^J	0.7	1.4	2.0	2.5	3.0	3.2	3.4	3.2	3.0	

- A. Annual Growth in emissions were determined by subtracting one years emissions from the previous year's emissions. Emissions' growth in 2011-2014 were determined by taking the difference between 2015 and 2010 and dividing that by 5 years.
- B. The growth in these emissions were taken directly from the emissions inventory, and were reported by road type. Control for Regulation VIII is accounted for.
- C. These totals were obtained from ARB. Current year's emissions are subtracted by the previous year's emissions to obtain the annual growth.
- D. Cumulative growth was determined by creating a running total of emissions from each year
- E. Rule penetration is estimated to be 85% based on District experience with CEQA projects.
- F. District staff estimate
- G. Determined by multiplying rule penetration of operational emissions, estimated sources to perform on-site reductions, average mitigation achieved on-site, and adding the reductions for each year.
- H. Determined by subtracting a particular years on-site reduction from the Rule Penetration of Operational Emissions for that year.
- I. Equals 5 x Remaining Subject Emissions That total was then divided by 12 to account for the average project life of the estimated emission reduction projects.
- J. Determined by adding On-site Reductions and Off-site Reductions
- K. Total emissions were used for each year, since all construction activity each year is for new development
- L. These emissions were taken from ARB and interpolated based on 2005, 2010, and 2015.
- M. Modeling in the 2003 PM10 indicated that 1.5 tons of NOx are equivalent to 1.0 tons of PM10.
- N. This is a rule requirement
- O. Determined by multiplying Remaining Subject Emissions with 20%, and dividing by 7 to account for the average project life of the estimated emission reduction projects.
- P. Determined by multiplying Remaining Subject Emissions with 45%, and dividing by 12 to account for the average project life of the estimated emission reduction projects.

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Appendix B: Emissions Reduction Analysis for Rule 9510 and 3180

December 15, 2005

EMISSIONS INVENTORY CATEGORY	2006	2007	2008	2009	2010	2011	2012	2013	2014
Construction PM10 Exhaust Emissions									
PM10 Exhaust from Construction Equipment ^L	1.7	1.6	1.5	1.4	1.4	1.3	1.2	1.2	1.1
Rule Penetration of Construction PM10 & PM10 Equiv. Emissions (tpd) ^E	1.4	1.4	1.3	1.2	1.2	1.1	1.0	1.0	0.9
On-site Reductions									
Estimated Sources to perform on-site reductions (%) ^F	10%	20%	30%	40%	50%	50%	50%	50%	50%
Average Mitigation achieved on-site (%) ^N	45%	45%	45%	45%	45%	45%	45%	45%	45%
Onsite Reductions (tpd)^G	0.1	0.1	0.2	0.2	0.3	0.2	0.2	0.2	0.2
Off-site Reductions									
Remaining Emissions (tpd) ^H	1.4	1.2	1.1	1.0	0.9	0.8	0.8	0.8	0.7
Reductions from 2006 Development	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Reductions from 2007 Development		0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Reductions from 2008 Development			0.04	0.04	0.04	0.04	0.04	0.04	0.04
Reductions from 2009 Development				0.04	0.04	0.04	0.04	0.04	0.04
Reductions from 2010 Development					0.03	0.03	0.03	0.03	0.03
Reductions from 2011 Development						0.03	0.03	0.03	0.03
Reductions from 2012 Development							0.03	0.03	0.03
Reductions from 2013 Development								0.03	0.03
Reductions from 2014 Development									0.03
Reductions from 2015 Development									0.03
Total Off-site Reductions^P	0.1	0.1	0.1	0.2	0.2	0.2	0.3	0.3	0.3
Total Construction PM10 Reductions (tpd)^J	0.1	0.2	0.3	0.4	0.5	0.5	0.5	0.5	0.5
TOTAL ESTIMATED PM10 REDUCTIONS (tpd)	1.2	2.4	3.6	4.7	5.8	6.6	7.5	7.9	8.3

- A. Annual Growth in emissions were determined by subtracting one years emissions from the previous year's emissions.
- Emissions' growth in 2011-2014 were determined by taking the difference between 2015 and 2010 and dividing that by 5 years.
- B. The growth in these emissions were taken directly from the emissions inventory, and were reported by road type. Control for Regulation VIII is accounted for.
- C. These totals were obtained from ARB. Current year's emissions are subtracted by the previous year's emissions to obtain the annual growth.
- D. Cumulative growth was determined by creating a running total of emissions from each year
- E. Rule penetration is estimated to be 85% based on District experience with CEQA projects.
- F. District staff estimate
- G. Determined by multiplying rule penetration of operational emissions, estimated sources to perform on-site reductions, average mitigation achieved on-site, and adding the reductions for each year.
- H. Determined by subtracting a particular years on-site reduction from the Rule Penetration of Operational Emissions for that year.
- I. Equals 5 x Remaining Subject Emissions That total was then divided by 12 to account for the average project life of the estimated emission reduction projects.
- J. Determined by adding On-site Reductions and Off-site Reductions
- K. Total emissions were used for each year, since all construction activity each year is for new development
- L. These emissions were taken from ARB and interpolated based on 2005, 2010, and 2015.
- M. Modeling in the 2003 PM10 indicated that 1.5 tons of NOx are equivalent to 1.0 tons of PM10.
- N. This is a rule requirement
- O. Determined by multiplying Remaining Subject Emissions with 20%, and dividing by 7 to account for the average project life of the estimated emission reduction projects.
- P. Determined by multiplying Remaining Subject Emissions with 45%, and dividing by 12 to account for the average project life of the estimated emission reduction projects.

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