

SOUTH COAST AOMD STAFF COMMENTS

13-7-3 PUBLIC HEARING TO CONSIDER THE ADOPTION OF THE REGULATORY PROPOSAL TO DETERMINE AND CONTROL EVAPORATIVE EMISSIONS FROM OFF-HIGHWAY RECREATIONAL VEHICLES

South Coast AQMD staff recommendation:

• Support adoption of proposed regulation as originally proposed on June 5, 2013

Concern: Proposal to exclude "Red Sticker" Vehicles from Current Proposed Regulation

- Estimated 0.25 tons/day ROG emission reductions foregone
- ROG emission reductions needed for ozone attainment; reduce air toxic exposure
- Uncertainties associated with future rule development

SCAOMD Staff Suggested Addition if Exclusion is Adopted:

- 1. Depending on the proposed language to exclude "Red Sticker" vehicles:
 - Include a provision with the proposed exclusion that the exclusion will sunset if no other regulatory action is taken on "Red Sticker" Vehicles; or
 - Include a provision that the exclusion will only occur if the "Red Sticker" vehicles are subject to another regulation.

2. Alternatively:

• Include language in the Adoption Resolution recognizing that evaporative emissions from "Red Sticker" vehicles will be subject to future regulations or be included in the current regulatory proposal if no other regulation is adopted by 2018.