Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Dave Roberts	District 3
Ron Roberts	District 4
Bill Horn	District 5

June 22, 2015

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: UPDATES TO THE PROPOSITION 1B: GOODS MOVEMENT EMISSION REDUCTION PROGRAM – GUIDELINES

To Whom It May Concern:

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed revisions to the Proposition 1B: Goods Movement Emission Reduction Program (GMERP) Guidelines. The District has successfully implemented GMERP in San Diego County since 2008 and as a result, the region has benefited from significant reductions in diesel emissions from goods movement activities.

The District submitted a letter to CARB staff on May 8, 2015 responding to the Staff Draft Concept Paper (April 2015)[1]. While some of the District's comments were incorporated into the draft Guidelines document, many comments were not addressed and remain applicable. The District invites CARB staff to review these comments to determine where revisions can be made in the final Guidelines.

In addition to the comments in the District's previous letter, the comments below are being submitted following review of the draft Guidelines document and Staff Report:

1. **New project categories**

   Appendix A (page A-9) of the draft Guidelines document pertains to electric charging stations and hydrogen fueling infrastructure. While not clearly identified in the draft Guidelines, the explanatory Staff Report states these projects would be subject to a ten-year project life. In subsequent conversations with CARB staff, it has been indicated that this project life should be five years. The District recommends making this change during the 15-day change period, if approved.

[1] See Attachment A

Appendix F (Transportation Refrigeration Units (TRU)) discusses installation of electric infrastructure and equipment compatible with electrically powered TRUs. The District is concerned that the funding amounts proposed, and minimum number of power/fuel receptacles needed to be eligible, may not be enough to attract applicants for large and small-scale installations. For example, if a small fleet applied to install three power plugs, the applicant would not be eligible unless they installed ten power plugs, at a minimum. CARB staff has reiterated to Districts that fleets purchasing infrastructure alongside zero-emission TRUs do not need to install a minimum number of plugs to receive infrastructure funding. Instead, the minimum only applies to applicants only purchasing infrastructure. Given the confusion, the District recommends this language be reviewed and modified during the 15-day change period, if approved.

The District also recommends re-evaluating the new project categories added to Appendix E (Cargo Handling Equipment) during the 15-day change period, if approved for similar reasons presented for Appendix F.

2. Priorities for Year 5 funds

Staff has proposed a revised priority for Year 5 funds, specifically that "a broader deployment of these (new) technologies will be needed in the South Coast and San Joaquin Valley Air Basins to attain health-based air quality standards […][2]". The regions referenced do stand to benefit from adoption of new technology. However, the statement infers that other regions implementing Proposition 1B, such as San Diego, Sacramento, and the Bay Area, do not require the same assistance. The District recommends citing all Proposition 1B implementing air basins to ensure priorities are equitable.

3. Repower projects for large fleets

The project option to convert an existing diesel engine to a new engine for large fleets has been removed from the draft Guidelines document. This project option has been available since Year 1 of the program, and was also included in the recent Staff Concept Paper. Historically, the category has been seldom utilized by Class 7 and 8 vehicles due to high costs. However, momentum could be building for this category to be viable for Class 6 vehicles.

In Year 4, the District contracted with a large fleet to fund 47 diesel-to-propane engine conversions for Class 6 equipment. Once complete, these projects should be approximately half the cost of a brand new vehicle, while providing the same emission reductions. Documentation of recent cost estimates for engine purchases and installation were provided to CARB on June 17, 2015.

[2] California Air Resources Board (CARB), *Proposition 1B: Goods Movement Emission Reduction Program – Proposed Update to Guidelines for Implementation*. Chapter II(B)(6) ARB Program Administration, Page 28. June 2015

Furthermore, recent CARB emission inventory data suggest that medium duty trucks, such as Class 6 vehicles, are the third highest emitting mobile source category in the San Diego region. Continuing fleet turnover in this category is essential for the region to meet more stringent federal and state air quality standards. The District recommends restoring the repower project category to the final Guidelines to allow advanced technology engine conversions (electric, CNG, LNG, fuel-cell, or propane) for Class 6 vehicles.

4. Renewable fuel project option for optional low-NOx and CNG truck projects

The Concept Paper referenced a renewable fuel contract being used in conjunction with the purchase of a MY2015+ engine meeting the optional low-NOx standard. This requirement has been removed from the draft Guidelines document. However, the District believes the option for applicants to purchase renewable fuel deserves additional consideration and inclusion within the Guidelines. We recommend including an additional tier of increased funding for applicants who can commit to purchasing renewable CNG fuel while under contract. Encouraging applicants to take advantage of technology that provides near-zero emissions is essential for California regions to meet future air quality standards.

5. Administrative changes

The draft Guidelines document revises the compliance check process used to ensure truck fleets comply with CARB rules and regulations. The District is supportive of the new streamlined process. However, the draft Guidelines do not address who would ultimately be responsible should local agencies (or CARB) find that TRUCRS documentation is incorrect or fraudulent. Districts do not have administrative access to the TRUCRS reporting system, and rely solely on the documentation provided by the applicant at the time of application to determine eligibility. To protect local agencies, the District strongly recommends the language below, modified from the Voucher Incentive Program, be included during the 15-day change period, if approved to applicable sections within the Guidelines:

> *"Air districts are not required to validate fleet information and will not be held accountable if inaccurate fleet information is provided."*[3]

The draft Guidelines also reference reimbursement for projects completed once CARB has certified and verified the new equipment. This requirement is not new. However, given the new complexities of the equipment being purchased, the requirement may need to be revised. An applicant may not be able to order new equipment until a CARB certification is received from the manufacturer. If this occurs, anticipated operational deadlines in Grant Agreements and contracts may be significantly delayed. The District recommends review and consideration of this possibility while Grant Agreements and deadlines are being developed for Year 5.

[3] California Air Resources Board (CARB). *Voucher Incentive Program Guidelines.* Section C(1)(c). April 2015

6. **Co-funding of truck projects**

   The draft Guidelines document adds a requirement that limits co-funding of a project to only two sources of state funding, and restricts total funding to 90% of the eligible project cost. The Guidelines should clarify how local sources of match funding would be affected with this new requirement. For example, would the District be able to offer additional match funding on top of any funding received from Proposition 1B GMERP and another state source (i.e. AQIP) if the applicant purchased a zero-emission vehicle? If so, would the total project grant amount continue to be limited to 90% of the eligible project cost?

7. **Commercial Harbor Craft scrap requirements**

   Appendix D (page D-7) of the draft Guidelines document requires the local agency to ensure the impound and transport of the old engine to a dismantler no later than 90 days after the new engine is placed into operation. As the District has previously commented, dismantlers do not typically accept marine engines. Therefore, for Commercial Harbor Craft projects only, the District will interpret "dismantlers" to include scrapyards for Year 5, unless otherwise instructed by CARB.

Thank you for the opportunity to comment on the proposed changes to the GMERP Guidelines. If you have any questions or need additional information, please contact me at (858) 586-2641 or Andy.Hamilton@sdcounty.ca.gov.

Sincerely,

ANDY HAMILTON
Supervising Air Resources Specialist

AH:nc

Attachments (1)

Attachment A

AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Dave Roberts	District 3
Ron Roberts	District 4
Bill Horn	District 5

May 8, 2015

Ms. Barbara Van Gee
Goods Movement Strategies Section
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: UPDATES TO THE PROPOSITION 1B: GOODS MOVEMENT EMISSION REDUCTION PROGRAM – STAFF DRAFT CONCEPT PAPER

Dear Ms. Van Gee:

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board's (CARB) Staff Draft Concept Paper proposing updates to the Proposition 1B: Goods Movement Emission Reduction Program (GMERP) Guidelines. The District has successfully implemented GMERP in San Diego County over the past few years and as a result, the region has benefited from significant reductions in diesel emissions from goods movement activities.

The District is supportive of CARB's efforts to tie incentive funding to the next generation of technology. Ultimately this will assist in the region's efforts to achieve a cleaner and more sustainable freight network, and help the region in meeting more stringent federal and state air quality standards. However, the District does have concern that some emission reductions in the short-term will be forgone in favor of long-term goals. The recommendations addressed within this letter may help alleviate these concerns.

In the spirit of continuing to provide effective incentives to reduce diesel emissions associated with goods movement as well as improving efficiency implementing GMERP, the District submits the following comments for the proposed concepts under evaluation:

1. **Enhance incentives for fleets to apply for zero and near-zero technology grants**

   One of the key themes evident within the Concept Paper is the need for Year 5 of GMERP to demonstrate "support for advanced technologies, with the hope that robust

offerings will speed commercialization of zero and near-zero equipment."[1] As indicated previously, the District believes this is a worthy goal and stands ready to assist in this effort. However, after review of the proposed revisions and public input from recent public workshops, it is clear that the revised program will have trouble attracting applicants. From our experience, simply providing a grant amount increase will not be sufficient to incentivize users to apply. This is supported by recent comments from fleet owners at the workshops, who indicated even receiving a "free" truck may not be attractive without being able to see the equipment and understand its operating characteristics.

To ensure successful program participation and implementation, the District believes additional certainty, safeguards, and compensation will be required. Potential concepts to enhance participation include the following:

- Guarantee a significant percentage of the total vehicle cost (as close to 100% as possible, or more), rather than simply a specific grant amount (see #2 below).
- Work with the Department of Motor Vehicles (DMV) to offer reduced DMV registration fees for zero and near-zero emission equipment.
- Work with appropriate federal agencies to reduce or waive the federal excise tax on new zero and near-zero equipment. Many owners avoid purchasing new equipment simply because of this tax.
- Secure warranty guarantees from manufacturers prior to local agency solicitations or contracting with applicants.

2. Guarantee a significant percentage of the total vehicle cost (as close to 100% as possible, or more), rather than simply a specific grant amount

Draft Guidelines Table 1 includes potential grant amounts per vehicle, if found to be eligible and awarded. The District is encouraged by the increases proposed but is concerned that zero and near-zero equipment may ultimately be more expensive than analyzed today. A "static" grant amount leaves no flexibility for applicants who may face vehicle costs significantly higher than estimated at the time of application.

To address this concern, the District proposes setting a guaranteed percentage of the overall project cost as a grant amount alongside (or in lieu of) the amounts proposed in the Concept Paper. For example (if adopted), an applicant applying for a MY2015+ Class 6 zero-emission truck might have the option to receive a grant of $100,000 or 99% of the overall vehicle cost, at the District's discretion. Adopting such methodology in the trucks category will alleviate applicant concerns of higher than expected costs of the new equipment. It also sends a strong signal to applicants that CARB and its Board stand behind these new technologies, no matter how costly the technology might ultimately be, in an effort to put them into use as quickly as possible. Similar grant methodologies are now being proposed in the Commercial Harbor Craft category.

The District firmly believes that the project percentage needs to be as close to 100% of the overall project cost as possible (or even exceed it), in order to encourage potential

[1] California Air Resources Board (CARB), *Proposition 1B: Goods Movement Emission Reduction Program - Update to Program Guidelines, STAFF DRAFT CONCEPT PAPER*, April 2015. Page 2.

applicants. Concerns over cost-effectiveness are not applicable at this stage of technology development, as all zero and near-zero emission equipment should receive priority ranking regardless of their cost-effectiveness score, and no such minimum exists currently in the Guidelines. Ranking of projects and funding availability will determine the most viable projects that are ultimately funded.

3. **Allow large fleets (four or more) to purchase new replacement diesel trucks meeting the MY2010 emission standard (0.20 g/bhp-hr or lower NOx and 0.01 or lower PM).**

The proposal focuses heavily on incentivizing new technology that is not yet commercially available. While commendable, it fails to recognize that Districts could benefit in the short-term from funding additional cleaner equipment that is commercially available right now. The draft CARB white paper, "Sustainable Freight: Pathways to Zero and Near-Zero Emissions," acknowledges[2] that efforts are needed in the short-term to help Districts meet these standards. By allowing already compliant large fleets using the phase-in option to purchase brand new diesel equipment, the District would obtain at least three years of surplus NOx emission reductions that would not otherwise be captured under the current proposal. In regions that are close to meeting attainment goals, these additional reductions could be crucial.

Additionally, many fleets may not be able to, or may not wish to, adopt the next generation of technology at this time. Many industries and companies are reluctant to purchase new technologies until they have been proven in the field. A funding option that allows such affected equipment owners to purchase the cleanest equipment currently available should still be available in these cases.

4. **Reduce the California operation requirement for new equipment from 90% to 75% across all project categories with no reduction in the funding amount**

Reducing health risks in communities impacted by border-crossing activities is identified in the Guidelines as a priority for Year 4 and later GMERP funds (Chapter II §B.5.). Continuing to require that funded equipment operate 90% of the time within California hinders the ability of these funds to fully achieve the legislative intent of reducing emissions and public health risk associated with the movement of freight commencing at the state's seaports and land ports of entry as stated in California Health & Safety Code §39625 (c).

San Diego County's largest concentration of heavy-duty diesel trucks is located at and near the Otay Mesa port of entry and many of these trucks are involved in cross border goods movement activities. According to the U.S. General Services Administration, the Otay Mesa port of entry is one of the ten busiest land ports in the country and is the busiest commercial port on the California/Baja California border, handling the second highest volume of trucks and the highest dollar volume of trade among all U.S. land ports. Many of these high-polluting, older, cross border trucks are not eligible for funding because they operate less than 90% of the time within California, even though

[2] California Air Resources Board (CARB), *Sustainable Freight: Pathways to Zero and Near-Zero Emissions – Discussion Draft*, California Sustainable Freight Initiative, April 2015 (http://www.arb.ca.gov/gmp/sfti/Sustainable_Freight_Draft_4-3-2015.pdf)

most are based in California and operate a large majority of time within the state. Moreover, their contribution to public health risk can be equal to or greater than some trucks that spend more time in California. Most of these trucks do not travel far from either side of the border, and District meteorological analysis shows the impact of their emissions can be felt in California even when they are operating in Mexico.

To increase the amount of emission reductions that can be achieved in California from border-crossing goods movement activities, the District recommends revising the California operation requirement for new equipment from 90% to 75% across all project categories (including trucks) with no reduction to the amount of funding. While the District is encouraged that the proposal would allow other project categories to take advantage of this threshold (notably commercial harbor craft and locomotives), the District believes this should also be applied to the heavy-duty truck category.

Lowering the in-state mileage requirement to 75% would not dilute program cost-effectiveness, since projects would continue to be ranked against one another, and only the most cost-effective projects would be funded. At least in the Mexican border region, the State of California would also continue to receive the great majority of the resulting health and environmental benefits, in line with statutory requirements in California Health & Safety Code §39626 (a)(1)(E).

5. Eligibility of 2015+ engines certified to optional low-NOx standard

The proposal states that new MY2015+ engines meeting the optional low-NOx standard must be certified at 0.02 g/bhp-hr of NOx to be eligible for funding. However, the document acknowledges that engines meeting a slightly higher threshold (between 0.1 and 0.02 g/bhp-hr NOx) also meet the optional low-NOx standard, but would not be eligible for grant funding. To encourage the purchase of all new equipment meeting the optional low-NOx standard, the District recommends revising eligibility to include new engines certified to 0.1 g/bhp-hr or lower NOx.

6. Eligibility of 2015+ hybrid, hybrid zero-emission, and zero-emission trucks

The proposal identifies additional project funding for hybrid, hybrid zero-emission, and zero-emission truck projects. The District supports these increases but has concern that eligible new equipment will be limited. As of today, no hybrid or hybrid zero-emission trucks are currently certified by the Air Quality Improvement Program (AQIP) for Class 6, 7, or 8 equipment that would be suitable for GMERP-eligible applicants (i.e. step vans, walk-in vans, and box trucks). Additionally, only five zero-emission models are certified meeting similar parameters. The District requests that CARB's GMERP staff work with the AQIP certification branch to ensure that additional models could be certified as quickly as possible when available, to adhere to liquidation deadlines.

7. Eligibility of truck project options not identified in the Concept Paper

The District recommends expanding eligibility to large fleets of existing Class 6 equipment (MY1998 and newer) to complete replacements of MY2015+ diesel engines. The proposal currently limits eligibility of Class 6 equipment to small fleets. Interest in

Class 6 hybrid vehicles has grown significantly in recent years, and could be increased by allowing large fleets to take advantage of GMERP and AQIP funding.

Additionally, the Concept Paper and 2013 Guidelines omit eligibility for trucks with MY2007-2009 engines. At the April 29, 2015 public workshop, CARB staff specified that NOx emission reduction potential was minimal from MY2007-2009 engines, and thus these engines were not included for eligibility. To determine the true impact of this decision, the District analyzed EMFAC data for the 2015 baseline year for GMERP eligible truck categories in San Diego County[3] and found that over 1,100 tons of NOx are emitted annually from GMERP eligible MY2007-2009 engines. While some of this equipment may not ultimately be eligible for GMERP, it is clear that the potential emission reductions are significant. The San Diego region may require additional near-term NOx reductions from this group of vehicles to meet tightening federal ozone standards.

8. Funding levels for Truck projects

Table 1 (Row E) of the Concept Paper lists conversion of a diesel engine to a 2015+ zero-emission engine with a grant amount of $60,000-$80,000 per vehicle. Although the total cost of this project is unknown at this point, it is likely that the proposed amounts need to be higher. In Years 3 and 4 of GMERP, the District received quotes of $80,000 to $90,000 per vehicle for truck repowers to new diesel engines. The cost of converting to electric is likely to be much higher than a diesel repower. For this to be a truly viable category, the incentive amount would need to cover the majority of the cost of the new equipment, battery, and any engineering/design costs.

Table 1 (Row F) shows that fleets of three or fewer trucks could receive a grant of $30,000 for a MY2011+ diesel engine replacement project, and $35,000 for a new 2015+ diesel engine replacement. The award difference between purchasing a used, five-year old Class 7 vehicle and a brand new 2015+ Class 7 vehicle is only $5,000. Inevitably, because of the small grant amount difference, purchasers will opt to select the $30,000 option which would be more cost-effective for the buyer. To encourage more applicants to purchase brand new Class 7 vehicles, the District recommends at least $40,000 in grant funding per project.

9. Renewable fuel contract requirement for optional low-NOx truck projects

Table 1 (Footnote 2) of the Concept Paper references renewable fuel contracts being required with the replacement purchase of a MY2015+ engine meeting the optional low-NOx standard. The District believes this requirement should be optional, not required. While the intent of funding close to zero-emission equipment is clear, it is uncertain how requiring a fuel contract would work administratively for Districts and applicants.

The District understands that optional low-NOx standard equipment is not limited to natural gas, but that natural gas equipment would be available well before diesel equipment (around five years), as acknowledged in CARB's Draft Technology and Fuels

[3] Refer to Figure 1. Inventory data available upon request.

Assessment[4]. This presents a problem in regions lacking natural gas infrastructure such as San Diego/Imperial Counties. As of April 2015, no more than 12 total stations exist between the two counties. However, many of these stations are in areas not readily accessible to trucking fleets, and are not located where the majority of truck traffic occurs. For example, only two Clean Energy compressed natural gas (CNG) stations offer renewable fuel in San Diego County, and both are located in Downtown San Diego. Trucks in the region typically avoid the downtown area due to heavy traffic going to and from the Airport.

To remedy this potential problem, the District recommends increasing the incentive for applicants committing to renewable fuel, rather than requiring it for all applicants. Providing additional funding to applicants that can feasibly commit to a renewable fuel contract will provide the emission reductions CARB is envisioning, but not discourage applicants who may not be able to obtain renewable fuel at this time.

10. Project rankings and priority

It is unclear in the Concept Paper whether small fleets would continue to receive priority on project ranking lists, as was done in Year 4 of the GMERP program. If small fleets continue to receive priority, an explanation is needed as to who will be ranked first compared to zero-emission and optional low-NOx standard projects, which also are proposed to receive priority.

The District also recommends keeping the hierarchy and priority of projects to a minimum. As evidenced in Year 4, multiple priority categories within a program tend to complicate implementation and lead to confusion by all parties. To avoid this, the District recommends not prioritizing optional low-NOx equipment and small fleets, if possible.

11. New project category for funding Transportation Refrigeration Units (TRU) and associated infrastructure

The District is supportive of this new category, but is unclear on some of the detailed requirements that will be included in further Guideline revisions. Questions we would anticipate staff clarifying with the adoption of the new Guidelines include:

- Could an applicant apply for new TRU units and infrastructure?
- If so, how would the emission reductions be calculated?
- If so, would both projects receive emission reduction credit?

Additionally, the District recommends removing the requirement of funding the "lower of" either the percent of overall cost or set grant amount. For example, an applicant who might want to install more than the required ten power plugs for zero-emission TRU's would be forced to take the lower grant amount of $30,000, even if they wanted to install 100 plugs. This scenario would result in the applicant installing only the minimum amount to be eligible. Similar language has been proposed to be removed from the

[4] California Air Resources Board (CARB), *DRAFT Heavy-Duty Technology and Fuels Assessment: Overview*, California Sustainable Freight Initiative, April 2015 (http://www.arb.ca.gov/msprog/tech/techreport/ta_overview_v_4_3_2015_final_pdf.pdf)

Commercial Harbor Craft category and instead gives discretion to the Districts to determine which option works best.

12. Locomotive eligibility

The 2013 Guidelines require locomotives to demonstrate at least 20,000 gallons of fuel usage to be eligible. The District recommends lowering this requirement to 10,000 gallons per year, or allowing the applicant to demonstrate sufficient hourly usage that would ensure the project meets cost-effectiveness requirements. Locomotive operators in the San Diego region have shown interest in this category in the past, but have not been eligible because they do not meet the 20,000 gallon limit. Lowering this eligibility requirement would allow more applicants to apply, while still ensuring cost-effective emission reductions.

13. Commercial Harbor Craft

The District is supportive of the modifications that have been proposed and thank CARB staff for their flexibility in making the category a more viable option to vessel owners.

14. Liquidation deadlines

The District is supportive of extending the liquidation deadline from 18 months to 36 months in grant agreements. However, the District requests that the Guidelines specify which technologies are not yet commercially available, and thus are subject to this modification. Doing so will help Districts inform potential applicants of the operational deadlines in Notices of Funding Availability.

15. Previous comments not addressed from the 2013 Guidelines

The District previously submitted written comments to the Board on January 23, 2013, addressing numerous concerns about the Program Guidelines. The following recommendations were either not addressed or not adopted, but still worthy of consideration:

- **Modify contractual mileage requirement for Class 6 new equipment.** Appendix A of the 2013 Guidelines requires all repower and replacement projects to commit to a project life of five years or 500,000 miles, whichever comes first. Class 6 trucks are typically used for shorter routes and as such do not accrue mileage quickly. Therefore, the project life for Class 6 trucks should be reduced to five years or 250,000 miles, whichever comes first. Left as is, no Class 6 replacement truck will likely meet the mileage limit.
- **Remove all references to wet signatures either from applicants, agencies, or CARB.** Doing so will assist in the District's efforts to go paperless with all processes.
- **Remove the cost-effectiveness cap for grid-based shore power projects.** Appendix C (page C-1) of the 2013 Guidelines limits the amount of funding available for grid-based shore power projects at unregulated cargo ship terminals. Removal of the cap is recommended as any funded project within this category would provide reductions that are entirely surplus to CARB's Ships at Berth Rule.

- **Remove requirement to purchase a GPS device for commercial harbor craft projects.** Appendix D (page D-1) of the 2013 Guidelines requires commercial harbor craft projects that select the option for 90% California operation to install an active GPS device. The District recommends removal of this requirement as it will result in additional costs to the equipment owner and could serve as a deterrent to project applicants.
- **Revise commercial harbor craft project scrap requirements.** Appendix D (page D-7) requires the local agency to ensure the impound and transport of the old engine to a licensed dismantler no later than 30 days after the new engine is placed into operation. CARB has indicated through discussion with the District that these requirements are not in line with how typical marine projects are handled in other grant programs, such as the Carl Moyer program. Licensed dismantlers do not typically take in marine engines. They are instead usually delivered to a local metal scrapyard after being removed and destroyed by the equipment owner. The District receives confirmation via receipt with engine serial number that the engines have been delivered to a scrapyard. The District recommends that this section be revised to reflect this common practice.

Thank you for the opportunity to comment on the proposed changes to the GMERP guidelines. If you have any questions or need additional information, please contact me at (858) 586-2641 or Andy.Hamilton@sdcounty.ca.gov.

Sincerely,

ANDY HAMILTON
Supervising Air Resources Specialist

AH:nc

Attachments (1)

Figure 1– EMFAC Analysis