

Justification for Removing Confidential Information from the Off-Road Simulation Model (OSM)

The Air Resources Board (ARB or Board) is committed to maintaining transparency and complying with Assembly Bill (AB) 1085 and the Public Records Act. For this reason ARB staff is releasing the Off-Road Simulation Model (OSM) to the public so that stakeholders may reproduce the results obtained by staff using a subset of data. However, as provided for in AB 1085 and the Public Records Act, ARB also has a commitment to keeping confidential the proprietary information provided to staff by the regulated community.

The functionality of the OSM depends on the information reported to ARB in the Diesel One-Stop Online Reporting System (DOORS). Much of the information in DOORS, however, is proprietary and must be kept confidential. DOORS contains identifying information such as fleet names and addresses and contact names, as well as details on the off-road vehicles owned by each fleet.

It is for this reason that it is necessary for staff to modify the publicly released version of the OSM by modifying or removing all data within the DOORS portion of the OSM. To protect confidentiality, for the version of OSM posted for AB1085 compliance purposes, ARB staff has modified the DOORS data in OSM as follows:

- Staff did not import to OSM any identifying information unnecessary to calculating emissions or costs, such as fleet names and addresses and contact names.
- Staff also modified the DOORS identification (ID) numbers for each fleet (to prevent fleets from being identified) and modified the vehicle EIN's. The modifications to DOORS ID and EIN will not change the emissions or costs estimated by OSM, but will prevent individual fleets from being identified.
- Staff completely removed from OSM data for all fleets that have more than 500 vehicles within DOORS, as well as fleets that have "airline" in the company name.

The reason for removing these fleets and vehicles is due to the fact that, even with modified DOORS IDs and EINs and company names removed, they could be identified by the size of their fleets. This is due to the fact there would be relatively few fleets that would have the same number and type of vehicles, thus making it possible to identify them. Moreover, airline fleets are being removed because there are very few airlines within the state and their fleets are populated by highly specialized vehicles that would be easy to identify. There are 7,520 fleets with 121,684 vehicles that are used in estimating the off-road emissions inventory; of those 7,388 fleets with 101,268 vehicles are used in the modified version of OSM. Data for only 132 fleets, or less than 2 percent of fleets, have

been removed. Data for 20,416 vehicles, or approximately 17 percent of all vehicles, have been removed to maintain confidentiality.

Although the emissions estimates resulting from the public version of OSM will not match that of the ARB emissions inventory, the remaining fleets and vehicles constitute a large enough subset of the statewide fleet to allow interested persons to analyze the methodology and understand staff's conclusions. Staff have provided the emissions and costs resulting from this subset of fleets and vehicles to allow persons to compare their results.