

## EXHIBIT

### "A"

# Clean Air Coalition Advisory Committee Ozone Advance Plan Recommendations

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In support of the planning effort for the region's Ozone Advance Program (OAP), the Clean Air Coalition Advisory Committee (CACAC) recommends that the Clean Air Coalition (CAC) take the following actions at the meeting scheduled for September 4, 2013:

1. Approve a list of region-wide emission reduction and planning measures;
2. Approve a request to member jurisdictions to renew commitments made and implemented under the 8-Hour Ozone Flex Plan;
3. Approve a request to member jurisdictions to consider making commitments to implement additional emission reduction and planning measures within their own organizations and jurisdictions as outlined below.

CAC members and any other participating jurisdictions or entities should finalize commitments under #2 and #3, and notify the CAC and the CACAC co-chairs, by October 31, 2013. This will allow the Ozone Advance Program Action Plan to be written and adopted by the December 31, 2013 deadline.

## Background

The Ozone Advance Program Action Plan is the latest voluntary air quality improvement plan that the region is developing in partnership with the U.S. Environmental Protection Agency (EPA). The CAC sent EPA a "path forward letter" stating that the region intended to develop an Ozone Advance Plan by continuing and building upon the existing plan implemented under the 8-Hour Ozone Flex Program. The Coalition indicated that the region would complete an Ozone Advance Plan prior to the expiration of the 8-Hour Ozone Flex Program on December 31, 2013.

The CAC's previous three voluntary emission reduction plans succeeded in lowering ozone levels and in keeping the region compliant with EPA's standards. This was accomplished even as the area's population grew and EPA's standards became more stringent.

As required by the Clean Air Act, EPA is performing a scheduled review of its ozone standards. We anticipate this review will result in lowering the standard from 75 parts per billion (ppb) to between 60-70 ppb. Implementing a robust Ozone Advance Program Action Plan is critical if we are to have a chance at remaining in attainment (which is possible if the standard is set at 70 ppb). In 2012, there were seven days when the region experienced eight-hour ozone averages above the current standard of 75 ppb; 12 days over 70 ppb; and 61 days over 60 ppb. **Given that EPA is likely to set a new standard in the range of 60-70 ppb in 2015, additional emission reduction measures beyond what are currently in place will be needed to ensure that the area can remain in attainment of federal ozone standards.**

The CACAC has conducted extensive public and stakeholder outreach to get input on measures to reduce ozone-forming emissions. In the Austin-Round Rock Metropolitan Statistical Area (MSA),

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reducing NO<sub>x</sub> emissions is about 100 times more effective in lowering ozone than reducing volatile organic compounds (VOC) emissions, pound for pound, so any Action Plan would need to focus on NO<sub>x</sub> reduction strategies rather than VOC reduction strategies.

Based on the input received, staff analysis, and the CAC's intent as communicated in the "path forward letter," the CACAC has made the following recommendations for consideration in developing the Ozone Advance Plan:

## Regional Measures

"Regional measures" are measures that must either be implemented regionally, or would be more appropriate to implement regionally than by individual jurisdictions. If this list is approved, the CACAC would then develop a plan to carry out these measures with regional partners and incorporate these measures into the Ozone Advance Program Action Plan.

- A. Continue the regional trip planning & ridesharing program – MyCommuteSolutions.com, and recruit more employers to sign up to use the program.
- B. Conduct a coordinated region-wide outreach and awareness effort including, though not limited to:
  - Development of school curricula and/or conducting outreach through schools,
  - Multimedia public education programs, and
  - Business partnerships and recognition programs.
- C. Develop resources for local emission reduction and planning measures, such as "best practices" documents for procurement policies, fleet management policies, idling enforcement, and development measures; and provide assistance to local jurisdictions with grant applications.
- D. Continue to collect, track, and evaluate data on the Ozone Advance Program participants' efforts annually, and consolidate redundant reporting efforts.
- E. Encourage participation in the regional Clean Cities program.
- F. Seek funding to conduct the following regional research projects:
  - Assessment of vehicle inspection and maintenance program compliance levels,
  - Assessment of air quality impacts of options for shifting traffic from IH-35 to SH 130,
  - Assessment of impacts of shifting modes of transportation, and
  - Assessment of air quality impacts of regional non-road fleets and evaluation of impacts of policy options.

## Priority Measures for Consideration by Local Jurisdictions

"Priority Measures" are measures that the CACAC believes are accessible to all members of the CAC. They enjoyed very broad and intense support in the survey, require minimal resources to implement, and would provide an effective "baseline" program for any jurisdiction if implemented. The CACAC recommends that the CAC specifically single out these measures as "priority" measures for

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consideration by local member jurisdiction. Many jurisdictions already participate in some or all these measures.

These are also all steps that could have impacts on ozone levels in the short- to medium term (over the next 1-3 years). The CACAC, CAPCOG, CAMPO, and any other regional partners would work with local jurisdictions to facilitate the implementation of any new measures to reduce the burden on local staff.

- A. Business Evaluation of Fleet Usage: evaluate and improve the efficiency of the jurisdiction's fleet usage, focusing on using the cleanest vehicle appropriate for the jobs, consolidating trips, and in general, setting policies for fleet usage that reduce NO<sub>x</sub> emissions. Regional partners can assist jurisdictions in conducting these evaluations.
- B. Commit to applying for TERP and/or DERA funding when available to retrofit, repower, or replace older diesel vehicles and equipment owned and operated by the jurisdiction. Regional partners can assist jurisdictions in preparing these applications.
- C. Implement a commuter trip reduction program for the jurisdiction's own employees. These programs can include carpooling, vanpooling, the use of mass transit, flexible schedules, teleworking, guaranteed ride home assurances for commuters, parking cash-out programs, and others.
- D. Encourage local businesses to implement commuter trip reduction programs.
- E. Regularly plan for Transportation Emission Reduction Measures (TERMS) within the community and report progress to CAMPO annually. These include projects such as improvements to roadway performance, expanded transit, and improved or expanded bike or pedestrian infrastructure. CAMPO recently solicited TERMS commitments from its members and compiled a consolidated list of these projects. This list can be added to as needed.
- F. Re-commit to enforcement of heavy duty idling restrictions, adopt a written protocol for implementation, and track compliance. This will require the jurisdiction signing a new Memorandum of Agreement with the Texas Commission on Environmental Quality (TCEQ).
- G. Implement an Ozone Action Day program for the organization. The program could include, for example, an employee and community notification system, the use of flexible schedules and "work from home" options, or postponing nonessential use of vehicles and equipment.
- H. Commit to participate in regional measures.
- I. Annually track and report to CAPCOG for inclusion in an annual OAP report and performance evaluation:
  - Vehicle and equipment usage,
  - Electricity and gas usage,
  - Contracted construction and landscaping work, and
  - Details on performance of locally adopted measures.

## **Additional Measures for Consideration by Local Jurisdictions**

In addition to the measures a jurisdiction is already implementing and any of the "priority measures" listed above, CACAC recommends that each jurisdiction review the following list of additional measures

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that would help reduce NO<sub>x</sub> emissions and commit to additional measures as circumstances allow. Implementing additional emissions reduction measures will strengthen the Ozone Advance Plan and increase the likelihood of success. Based on staff analysis, these measures may require more time, financial, or staff resources to implement, or may be better suited politically to some jurisdictions rather than others. These are not presented in any order of preference. CACAC members stand ready to provide any additional analysis on these measures upon request of a jurisdiction.

- A. Implement procurement policies that would result in lower NO<sub>x</sub> emissions, such as:
  - Establish a preference for low-emission (Tier 2, Bin 4 or better) light-duty vehicles,
  - Require new trucks to be certified to meet California low-NO<sub>x</sub> idle standards,
  - Encourage the use of low-emission equipment and vehicles in contracts,
  - Encourage local sourcing of materials in supply contracts to reduce trucking activity.
- B. Commit to replace/repower/retrofit a certain percentage or amount of vehicles and equipment over a period of time (including any TERP or DERA project funding secured by the jurisdiction).
- C. Enhance compliance with the vehicle inspection and maintenance program (where applicable).
- D. Enhance vehicle idling restrictions and enforcement efforts. These could include notice requirements and conducting targeted enforcement actions against property owners and trucking companies.
- E. Implement policies to reduce open burning on Ozone Action Days.
- F. Require or incentivize commuter trip reduction programs for large employers.
- G. Implement special event emission reduction policies.
- H. Implement development measures to reduce growth in vehicle miles traveled and congestion.
- I. Implement development measures to reduce energy consumption from new developments.
- J. Implement development measures that will cool developed areas.
- K. Implement energy efficiency, renewable energy, and resource conservation policies that will result in reduced energy consumption:
  - Within the organization/jurisdiction's own operations, and
  - Within the community at large.

### Contact

Members of the CACAC are available to answer questions or to assist as needed. Please contact your CACAC representative or the CACAC co-chairs, Andrew Hoekzema from CAPCOG (ahoekzema@capcog.org, 512.916.6043) and Pharr Andrews from the City of Austin (pharr.andrews@austintexas.gov, 512.974.6476).