

US EPA ARCHIVE DOCUMENT

**This paper reflects preliminary agency thoughts and ideas and the options presented have not been thoroughly analyzed for legal defensibility**

draft 2/27/02

**Issue:** Will EPA be contemplating incentives for areas that want to take early action for reducing ozone under the 8-hour standard?

**Background:** Any State, Tribal, or local government may at any time, without a federal requirement to do so, elect to initiate emission reductions for a variety of reasons, including providing an additional measure of public health protection or to do early planning in advance of EPA's designation process for the 8-hour standard. EPA supports efforts by local communities that wish to adopt measures or take other action earlier than would be required by the Clean Air Act to address air quality problems and protect public health.

Many areas that are not meeting the 8-hour ozone standard, but are attaining the 1-hour standard, will need to undertake significant new emissions data gathering, modeling, planning and control strategy development efforts to meet State implementation plan (SIP) submittal requirements if designated nonattainment for the 8-hour standard. Many of these areas could benefit by implementing emission reduction strategies earlier than would be required under a traditional nonattainment designation. Air quality may improve sooner than required; areas may attain before EPA's designation process, or come back into attainment as rapidly as possible. These are reasons to provide incentives for these potential new nonattainment areas to implement early emission reductions programs. EPA is considering ways to provide incentives for these areas.

### **Definition**

For purposes of this issue, "early reductions" could mean:

- Implementation of measures by 2005 or earlier; and
- Attainment of the 8-hour ozone NAAQS by 2007 or earlier

### **Questions for Discussion**

1. What incentives should EPA provide for areas that take early action toward attaining the 8-hour ozone NAAQS?
2. What kinds of criteria should EPA use to evaluate an area's early action plan for achieving the 8-hour ozone NAAQS?