

APPENDIX D

LOCAL INITIATIVES

Bexar County Serious Area Attainment Demonstration State
Implementation Plan Revision for the 2015 Eight-Hour Ozone
National Ambient Air Quality Standard

Project Number 2024-041-SIP-NR

Bexar County 2015 Ozone NAAQS Moderate AD SIP Revision

Appendix D: Local Initiatives

Alamo Area Council of Governments (AACOG)

Weatherization Assistance Program. AACOG's Weatherization Assistance Program helps low-income individuals overcome the high cost of energy through the installation of energy conservation measures. Although the program does not address major home repairs, it can help lower the amount of energy used in a home by enhancing the structure's thermal boundary, ultimately helping a home stay warm in the colder months and cold in the warmer months.

Alamo Area Clean Cities Coalition. Clean Cities is a Department of Energy-funded program that supports the growth of alternative fuels and vehicles to promote environmental stewardship, economic development, and energy resiliency and independence in the transportation sector. The Alamo Area Clean Cities Coalition informs its stakeholders about incentives for vehicle/engine replacement, new and emerging technologies related to transportation energy efficiency, and potential partnerships to promote regional growth of alternative fuels.

Photochemical Modeling. As one of the only regional councils with in-house photochemical modeling experience, AACOG regularly performs photochemical modeling runs for its partner agencies and governments to predict the impact that pollution control strategies may have on ozone concentrations. AACOG partners with the Alamo Area Metropolitan Planning Organization (AAMPO) to identify locations along highways that contribute the most to ozone formation.

Property Assessed Clean Energy (PACE). AACOG administers PACE programs for 16 cities and counties in its service area. PACE provides low-cost, long-term financing for energy efficiency improvements to commercial properties. Eight PACE projects have closed in the region, ranging from under \$200,000 to \$48 million.

Regional Energy Management Program. AACOG administers a regional energy management program for local governments to learn more about energy efficiency technologies and incentives – particularly those offered by the State Energy Conservation Office. AACOG will host a series of informational workshops, roundtables, and other events about a wide range of topics to be informed by a regional survey. This program will promote PACE, hazard mitigation planning, building codes, benchmarking, and more.

Smoking Vehicle Reporting Program. AACOG operates a regional smoking vehicle reporting system to empower residents to report vehicles they see emitting visible smoke for more than 10 seconds, which is a violation of state law. Violators will receive a written notice of the violation, a reference to the state statute, and resources on incentives or programs to assist with vehicle repair or replacement. This program is modeled after a similar program at the North Central Texas Council of Governments.

Alamo Regional Transit (ART). AACOG operates on-demand and fixed-route transit service in 12 counties surrounding Bexar County. ART has begun transitioning its older gasoline and diesel fleet with cleaner burning propane fuel, with full delivery expected by Fall 2025.

Regional Solid Waste Management. AACOG supports its member governments as a pass through for Texas Commission on Environmental Quality (TCEQ) funding for solid waste management. Activities that this program funds include household waste collection events, vehicles, and other infrastructure to enhance recycling and other waste-to-landfill diversion strategies.

San Antonio Metropolitan Health District

Air Pollution Control Registration Program. City of San Antonio City Council passed Ordinance 2015-11-19-0967 that updated the language of Chapter 26, "Pollution Control," Article II "Air Pollution," by updating the state law references and requiring businesses that are an emission source within the city limits to register with Metro Health. The data from the registration provides information that Metro Health will use in determining strategies to lower ozone levels and other emission point sources. Another key component of the program is to work with businesses in San Antonio to take innovative and proactive steps to lower emissions and ozone levels. The Air Pollution Control Program educates businesses regarding the ordinances that have been passed by the City of San Antonio to improve air quality. The program works with businesses to assure they possess a valid Certificate of Occupancy, waste storage and disposal which includes the proper operation of air control equipment. Metro Health also responds to air quality related complaints and visits facilities to determine source and type of emissions, as well as need for registration.

Ozone Action Day Plan. The City of San Antonio Ozone Action Day Plan establishes guidelines and procedures for reducing emissions of ozone-forming compounds on Ozone Action Days for each City of San Antonio Department. Many of the strategies contained in the plan can be put into action on both Ozone Action Days and throughout the rest of the year. Each City of San Antonio Department has drafted its own Ozone Action Day Plan based on each departments' unique situation, abilities, and

constraints. The Ozone Action Day Plan is intended to promote awareness of the actions that can be undertaken to improve air quality and reduce ozone.

Ozone Technical Committee. Metro Health has identified local air quality professionals with the technical and scientific expertise for an Ozone Technical Committee to provide guidance on identifying evidence-based solutions to support ozone control strategies that will reduce ozone levels to the Environmental Protection Agency (EPA) standard in Bexar County. The Ozone Technical Committee continues to meet on a quarterly basis.

Environmental Education. The program raises awareness about the health effects of ground-level ozone, particularly during San Antonio's yearly ozone season (March 1st-November 30th). Through educational materials, presentations, events, and outreach campaigns, residents are encouraged to stay informed through air quality alerts and adopt individual actions that help reduce ozone formation, such as limiting vehicle idling and choosing environmentally friendly transportation options.

VIA Metropolitan Transit

Compressed Natural Gas Fleet. VIA has recently completed its transition from diesel to compressed natural gas (CNG) for its large bus fleet.

Fleet Electrification. VIA recently purchased eight electric transit buses.

Advanced Rapid Transit (ART). VIA's ART project is the only Texas project added to the President's funding recommendation list for Fiscal Year 2023. It marks the first time San Antonio and VIA have been able to access this type of funding, which requires transit service that operates in a dedicated lane. The 12-mile corridor will connect major employment and residential centers from the San Antonio International Airport, along San Pedro Avenue, through Downtown and south to the Missions area.

Bexar County

Facilities Management Energy Policy. This policy sets guidelines for the efficient use of the County's energy resources and establishes an energy recycling program. The primary goals are to reduce and conserve energy and promote environmental responsibility throughout Bexar County. This policy is also currently in the process of being updated, to advance the most efficient use of energy in the County as conditions evolve. Facilities Management has also launched a new recycling program aimed at reducing waste and promoting reuse within the County. Facilities Management partnered with the City and CPS to create Build San Antonio Green (BSAG), to address a

reduction in emissions, energy conservation and more. To date, BSAG has helped reduce nitrogen oxides (NO_x) emissions by over 306,000 lbs.

Public Works/Operational Services. Operational Services (OS) changed to propane mowers five years ago to reduce emissions. Given the amount of maintenance these crews conduct (frequency, size of the unincorporated area, etc.) this has significantly reduced emissions from property maintenance. OS also changed from hot mix to warm mix asphalt, reducing emissions during construction and repair of the right of way. In addition, OS applies full depth reclamation in order to recycle pavement. This reduces emission production from the manufacture of new asphalt material as well as emissions created from the transport of material from and to a worksite in traditional remove and replace practices. OS is also in the process of having its electrical energy uses audited to further decrease energy use and emissions produced.

Regional EV Compact. In 2021, Bexar County and Travis County partnered with the Texas Electric Transportation Resources Alliance (TxETRA), a statewide Electric Vehicle (EV) policy organization, to form an Austin-San Antonio Regional EV 'compact'. The compact is comprised of government, large employers, and educational institutions, all sharing the goal of reducing mobile emissions. The primary method to achieve this goal is through fleet electrification. Bexar County has created a fleet electrification pilot program with the intent of incorporating 16 electric vehicles, to include supporting infrastructure into Fleet operation for fiscal year 2023.

Anti-Idling Ordinance. Bexar County Environmental Services (ES) Department played a key role in planning and implementing anti-idling action in the region in partnership with the City of San Antonio. ES is involved in interdepartmental efforts to promulgate information regarding this policy. Direct action includes enforcement of violations, citations and putting up anti-idling signs at key locations around the County (e.g., truck stops).

Illegal Emissions Enforcement. ES conducts air quality investigations into alleged stationary source violations to reduce illegal emissions and coordinates with TCEQ investigators to take action and prosecute violators. ES also collaborates with the Bexar County Fire Marshals to reduce illegal burning and therefore emissions and particulate matter.

CPS Energy

Sustainable Tomorrow Energy Plan (STEP). STEP is the second phase of CPS Energy's award-winning energy efficiency and conservation program, originally known as the Save for Tomorrow Energy Plan. The new STEP program received approval for \$350

million in funding over 5 years (2022-2027) and aims to reduce our community's energy demand by 410 megawatts (MW). Additional program goals include the weatherization of 16,000 homes and 20,000 multifamily units, 1% energy savings per year, and almost 2M tons of avoided carbon dioxide (CO₂). The results of achieving these goals will also contribute to the avoidance of approximately 140 tons of NO_x over the life of the program.

Renewable Energy & Storage. San Antonio is ranked first in Texas and fifth in the nation for total solar power capacity according to the Environment Texas Research and Policy Center's report *Shining Cities: The Top U.S. Cities for Solar Energy*. Renewable energy generation refers to the energy generated from renewable sources, such as wind, solar, geothermal, hydrogen and landfill gas. The "nameplate" renewable capacity refers to the total maximum amount of renewable capacity in CPS Energy's portfolio. CPS Energy's existing renewable resources include 1,049MW of wind, 552MW of utility-scale solar and 10MW of battery storage resources. The first solar projects were awarded in 2022 for 480MW, and the community will receive \$19 million in economic benefits through a 25-year agreement. CPS Energy installed a battery storage project in partnership with Southwest Research Institute (SwRI) (10MW) and in late 2024 CPS Energy secured 120MW of battery storage under contract with OCI Energy. Installation of energy storage enables more renewable additions. CPS Energy currently has 730MW of solar and 520MW of battery storage under development. In 2022, CPS Energy signed a 15-year agreement with Quidnet Energy with the goal of building a grid-scale, long-duration energy storage system.

Power Generation Resource Plan Portfolio. CPS Energy's Board passed a resolution in August 2019 to support the City of San Antonio Climate Action & Adaptation Plan (CAAP). All of the efforts that reduce carbon for the CAAP have the co-benefit of also reducing ozone precursors. The CAAP commitment is to reach carbon neutrality by 2050 with interim emission reduction targets of 41% reduction (compared to 2016) by 2030 and 71% reduction by 2040. CPS Energy partnered with the community in 2022 to develop a new Power Generation Resource Plan focused on transitioning to cleaner sources of energy by 2030, while balancing customer affordability and system reliability. CPS Energy's Board passed a resolution on January 23, 2023, approving the updated generation plan and a portfolio that advances planned retirement dates for several fossil-fueled units and is projected to result in a reduction of 76% in NO_x and an over 40% reduction in Carbon Intensity by 2030 as compared to 2016.

NO_x Emissions Control Technology. CPS Energy reduced NO_x emissions by 75% from 1997 to 2023. Several efforts have contributed to the outstanding emissions reduction, including implementing and operating NO_x emission controls on power plants,

including low NO_x burners, separated overfire air (SOFA), and selective catalytic reduction.

Decommissioned J.T. Deely Coal-Powered Plant. CPS Energy decommissioned the J.T. Deely coal-fired power plant at the end of 2018 resulting in a reduction of approximately 3,000 tons of NO_x annually when compared to 2010.

Electric Vehicles (EVs) Fleet. The utility made the most significant purchase of any utility or private company when it acquired 34 XLPTM Plug-In Hybrid Electric Upfit Ford F-150 trucks in 2018 to gain 50% better fuel economy and a comparable reduction in emissions over similar vehicles. Today CPS Energy's electric fleet includes 45 Ford F-150 plug in hybrids, Mustang Mach E Cars, 7 Ford Lightning Trucks, 2 Chevy electric Silverado Trucks, 2 Chevy Bolt Cars, 2 55-foot Terex 100% electric Bucket Trucks, and 3 Electric Forklifts.

Electric Vehicles (EVs) Charging & Tools. EV adoption will continue to grow with expanded charging solutions. As of January 2025, there were 475 Level 2 public plugs and 189 Fast DC charging ports in the service area and CPS Energy provides electricity to them all. CPS Energy operates 25 public stations with 40 plugs at 17 publicly accessible locations.

Mow Down Smog Rebates. The Mow Down Smog Rebate program provides CPS Energy's customers with rebates for purchasing electric instead of gasoline-powered lawn equipment. The Mow Down Smog Rebate program is available seasonally from March 1 to August 31. According to an EPA study, replacing a gasoline powered mower with an electric or person-powered mower avoids emitting CO₂ (greenhouse gases) and NO_x and volatile organic compounds, which are ground-level ozone precursor emissions. Customers were granted 586 Mow Down Smog Rebates during 2022. Since the program started in 1998, customers have received over 12,800 rebates.

Tree Programs. The Green Shade program rebates are provided to customers to create shade which keeps homes cooler and reduces energy use. CPS Energy supports many community events where complimentary trees are offered. Each year, employee teams distribute more than 1,200 trees at events. Additionally, CPS Energy donates approximately 75 to 100 trees annually to Habitat for Humanity for planting at new home sites. Over the past ten years, customers and communities planted more than 20,000 trees supported through the rebate program and community event giveaways.

Ozone Action Day & Company Wide Policies. This is a CPS Energy company-wide policy that vehicles must be shut off and not allowed to idle and proper tire pressure is maintained in personal and company vehicles. Carpooling and flexible work schedules

such as working from home are encouraged. The company also recommends evening lawn care or use of electric lawn equipment. CPS Energy is exploring opportunities to update procurement processes to include products and materials that have a lower emission impact, including NO_x, volatile organic compounds, CO₂ and other greenhouse gases.