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# 1 Diminishing Returns or Compounding Benefits of 2 Air Pollution Control? The Case of NO<sub>x</sub> and Ozone

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8 **KEYWORDS.** marginal benefit, marginal damage, non-convexity, nonconvexity, NO<sub>x</sub>  
9 abatement, ozone mortality, adjoint

10 **ABSTRACT:** A common measure used in air quality benefit-cost assessment is marginal benefit  
11 (MB), or the monetized societal benefit of reducing 1 ton of emissions. Traditional depictions of  
12 MB for criteria air pollutants are such that each additional ton of emission reduction incurs less  
13 benefit than the previous ton. Using adjoint sensitivity analysis in a state-of-the-art air quality  
14 model, we estimate MBs for NO<sub>x</sub> emitted from mobile and point sources, characterized based on  
15 the estimated ozone-related premature mortality in the U.S. population. Our findings indicate  
16 that nation-wide emission reductions in the U.S. significantly increase NO<sub>x</sub> MBs for all sources,  
17 without exception. We estimate that MBs for NO<sub>x</sub> emitted from mobile sources increase by 1.5  
18 and 2.5 times, on average, for 40% and 80% reductions in anthropogenic emissions across the

19 U.S. Our results indicate a strictly concave damage function and compounding benefits of  
20 progressively lower levels of NO<sub>x</sub> emissions, providing economic incentive for higher levels of  
21 abatement than were previously advisable. These findings suggest that the traditional perception  
22 of a convex damage function and decreasing MB with abatement may not hold true for  
23 secondary pollutants such as O<sub>3</sub>.

24 INTRODUCTION. Estimating the health and environmental impacts of anthropogenic  
25 emissions is an important element of air quality decision-making. One measure of such impacts  
26 is marginal benefit (MB), or the incremental, monetized health or environmental benefit of  
27 reducing an additional unit (ton) of emissions. A related metric used in environmental economics  
28 that offers a reverse perspective is marginal damage (MD), or the health or environmental  
29 damage incurred by emitting an additional ton of pollutant. MB is an important decision metric  
30 in economic evaluation of air pollution policies as it provides a direct indication of the rate-of-  
31 return on potential investments made in abating emissions. Mathematically, MB/MD is the  
32 derivative of the total damage curve (i.e., the overall, monetized societal impact of air pollution)  
33 with respect to emissions. MB for criteria air pollutants is traditionally depicted to decrease as  
34 emissions are progressively reduced,<sup>1-2</sup> indicating diminishing returns with each added ton of  
35 emission control. Such a negatively or downward-sloped MB curve with abatement is  
36 mathematically equivalent to a convex total damage curve with abatement. Convexity in this  
37 context implies that as emissions are reduced, the societal damage of air pollution initially  
38 declines rapidly, but with continued abatement, this rate-of-decrease in damage, or the accrued  
39 benefits from abatement, slows. This general behavior is attributed to the natural assimilative  
40 capacity of the environment to cleanse itself of pollution; a capacity that loses efficiency as the  
41 atmosphere becomes more polluted.<sup>2</sup> At best, this is appropriate for some primary pollutants, but

42 a downward-sloped MB curve may be an oversimplification for secondary pollutants whose  
43 production depends nonlinearly on the availability of emitted precursors. The prime example is  
44 ground-level ozone ( $O_3$ ) formed from  $NO_x$  ( $NO + NO_2$ ) and volatile organic compounds (VOCs).  
45 At low levels of  $NO_x$  emissions, removal of each ton of  $NO_x$  is very effective in reducing  $O_3$ ,  
46 yielding a large, positive MB. At very high  $NO_x$  emission levels, and with limited VOCs,  
47 reducing  $NO_x$  may be counterproductive, leading to increased  $O_3$  concentrations through slower  
48 titration of  $O_3$  by NO (a negative MB or disbenefit).<sup>3-6</sup> This duality in  $O_3$  response to  $NO_x$  control  
49 seen in extreme chemical environments presents a specific, well-known case for non-convexity  
50 and an upward-sloped MB curve.

51 While non-convexity is a long-established concept in other areas of environmental  
52 economics,<sup>7-8</sup> such as aquatic ecosystems<sup>9</sup> or environmental aesthetics,<sup>10-11</sup> non-convexity in air  
53 pollution impacts is treated as an exception to the general rule.<sup>12-15</sup> Repetto,<sup>12</sup> using results from  
54 box model simulations with limited  $O_3$  chemistry, first suggested non-convexities in the response  
55 of  $O_3$  to precursor controls, but with a focus on  $NO_x$ -rich urban environments. Hakami et al.<sup>3</sup>  
56 used regional, high-order forward sensitivity analysis in an air quality model to quantify local  
57 responses of  $O_3$  to domain-wide precursor emission reductions. The authors found predominantly  
58 negative second-order derivatives of  $O_3$  with respect to  $NO_x$  emissions, indicative of a non-  
59 convex response surface. Drawing upon previous studies,<sup>4-5</sup> Fraas and Lutter<sup>14-15</sup> later discussed  
60 the exceptional case of non-convexity in the presence of negative MBs or disbenefits that poses  
61 challenges in implementing economically efficient policy instruments. While indications of non-  
62 convexity exist in the literature, a general lack of efficient modeling tools, data, and resources  
63 has inhibited characterization of the  $NO_x$  MB curve to fully test the assumption of convexity.  
64 This work intends to characterize the  $NO_x$  MB curve on a source-by-source basis, and

65 demonstrate that in the case of  $\text{NO}_x$  and  $\text{O}_3$ , non-convexity forms the general rule rather than the  
66 exception.

67 METHODS.  $\text{NO}_x$  MBs are partly driven by the sensitivity of  $\text{O}_3$  to  $\text{NO}_x$  that depends on the  
68 relative abundance of precursor species in the atmosphere. Characterization of the  $\text{NO}_x$  MB  
69 curve necessitates the use of atmospheric models that adequately describe the nonlinear pathway  
70 from  $\text{NO}_x$  emissions to  $\text{O}_3$  concentrations, and can do so on a ton-by-ton basis. Furthermore,  
71 sources differ in their public health impacts based on their proximity to population centers and  
72 the atmospheric conditions conducive to local and downwind  $\text{O}_3$  formation. This combination of  
73 factors indicates that the same ton of  $\text{NO}_x$  control for various sources may have different health  
74 impacts. Estimating MBs on a source-by-source level would thus yield invaluable information  
75 for air quality decision-making.

76 To estimate source-specific MBs, we use adjoint (or reverse) sensitivity analysis in a regional  
77 air quality model. The “reverse” or backward characteristic of the adjoint method indicates that  
78 influences on various receptors are traced back to individual sources through an auxiliary set of  
79 equations that govern source-receptor relationships. To accomplish this, the analysis entails  
80 backward (in time and space) integration of adjoint equations after forward simulations are  
81 carried out. More details about adjoint sensitivity analysis and its applications in health benefits  
82 assessment can be found elsewhere.<sup>6</sup> Our approach simultaneously calculates sensitivities of  
83 model output with respect to a large number of input parameters.<sup>16-17</sup> Achieving the same level of  
84 detail with traditional modeling approaches limits analyses to a few sources or groups of  
85 sources,<sup>4,18-19</sup> or else requires simplifications of nonlinear chemical processes that may lead to  
86 underestimations of  $\text{NO}_x$  MBs.<sup>5,20-21</sup> Adjoint sensitivity analysis is an ideal tool for the purpose  
87 of this study as it allows for estimating MBs for a multitude of pollutants across different

88 locations, sectors, and times while accounting for nonlinear atmospheric processes.<sup>6,22</sup> We note  
89 that while the adjoint method offers sensitivity information on a source-by-source basis, it cannot  
90 feasibly provide information about the distribution of impacts across receptors (a question more  
91 suitable to forward methods of sensitivity analysis). Adjoint sensitivity analysis is most  
92 appropriate for applications where a collective measure of policy effectiveness is sought, such as  
93 the total health or environmental damage of emissions, as in the case of seeking to estimate MBs.

94 We construct MB curves for mobile and point sources using the adjoint of the U.S. EPA's  
95 Community Multiscale Air Quality model, or CMAQ.<sup>23</sup> The gas-phase CMAQ-adjoint model  
96 used in this study is based on CMAQ v4.5.1 with the SAPRC-99 chemical mechanism.<sup>24</sup> The  
97 adjoint of CMAQ has been validated previously<sup>25</sup> and used in various health impact  
98 studies.<sup>6,22,26-27</sup> We use the standard U.S. EPA domain spanning the continental U.S. at a 36-km  
99 horizontal grid resolution with 34 vertical layers extending into the stratosphere. Our CMAQ-  
100 adjoint simulations are conducted over the O<sub>3</sub> season of 2007 (May 1 – September 30).  
101 Emissions are based on the National Emission Inventory (NEI) for the U.S. and the National  
102 Pollutant Release Inventory (NPRI) for Canada, and are generated using the Sparse Matrix  
103 Operator Kernel Emissions (SMOKE) model.<sup>28</sup> Meteorological inputs are from the Weather  
104 Research and Forecasting (WRF) model,<sup>29</sup> processed using the Meteorology Chemistry Interface  
105 Processor (MCIP). Performance evaluation of observed and simulated hourly O<sub>3</sub> concentrations  
106 for the 2007 O<sub>3</sub> season indicate a mean fractional error (MFE) of 16% and mean fractional bias  
107 (MFB) of 2.5%. Comparison of observed daily maximum 8 h average (DM8A) O<sub>3</sub>  
108 concentrations with simulated DM8As (used for health impact estimation) yields a MFE of 15%  
109 and MFB of 9.5%.

110 We define MB as the monetary societal benefit (\$) of reducing NO<sub>x</sub> emissions by 1 ton from a  
111 given mobile or point source. We focus our analysis on the MB of NO<sub>x</sub> emission reductions, as  
112 NO<sub>x</sub> has by far the largest impact on population exposure to O<sub>3</sub> of all precursor species.<sup>6</sup> Our  
113 estimations of MB account for averted mortality in the U.S. population resulting from reduced  
114 short-term O<sub>3</sub> exposure. We consider only acute O<sub>3</sub> exposure mortality, and not acute morbidity,  
115 as mortality has a high monetary value and is the largest contributor to the monetized health  
116 benefits of emission reductions.<sup>30</sup> We do not account for environmental impacts, as we focus our  
117 analysis on population health damages. We consider only acute exposure mortality without  
118 consideration for mortality from long-term exposure to O<sub>3</sub> based on the weight of  
119 epidemiological evidence for causal associations between O<sub>3</sub> and mortality.<sup>31</sup> As the overall  
120 behavior of NO<sub>x</sub> MBs is driven largely by the chemistry of O<sub>3</sub> production, we believe that the  
121 generality of our approach or results are not lost in exclusion of other O<sub>3</sub> damage endpoints. We  
122 note that NO<sub>x</sub> emissions also contribute to NO<sub>2</sub> exposure and inorganic PM formation, and that  
123 our MB estimates do not capture the full spectrum of impacts seen through species other than O<sub>3</sub>.

124 Adjoint estimation of NO<sub>x</sub> MBs is based on the definition of a scalar adjoint cost function,  $J$ , as  
125 follows.

$$J = V_{SL} \sum_t \sum_{\omega} M_{0\omega} P_{\omega} (1 - e^{-\beta \Delta C_{\omega t}}) \quad (1)$$

126 Detailed description of the application of equation (1) in the adjoint model is provided  
127 elsewhere.<sup>6</sup> For MB estimation,  $J$  is the monetized mortality count in the U.S. population  
128 attributable to short term O<sub>3</sub> exposure over May 1 – September 30, i.e., the 2007 O<sub>3</sub> season (\$);  
129  $V_{SL}$  is the value of a statistical life, estimated to be \$7.9 million in 2008 USD;<sup>32</sup>  $M_{0\omega}$  is the 2007  
130 all-age, non-accidental mortality rate in location  $\omega$  (yr<sup>-1</sup>, scaled to a daily rate);  $P_{\omega}$  is the 2007  
131 all-age population in location  $\omega$ , both of which are reported by the Centers for Disease Control

132 and Prevention (CDC) at the county level;  $\beta$  is the effect estimate derived from epidemiological  
133 studies; and  $\Delta C_{\omega t}$  is the change in DM8A O<sub>3</sub> concentration at time  $t$  and location  $\omega$ , with respect  
134 to a reference concentration of zero. We apply a  $\beta$  of  $4.27 \times 10^{-4}$  ppb<sup>-1</sup> for DM8A O<sub>3</sub> due to its  
135 wide coverage of populations across the U.S.<sup>33</sup>

136 We construct MB curves for 1 ton of emitted NO<sub>x</sub> using various U.S.-wide emission abatement  
137 scenarios. We use emission inventories for the O<sub>3</sub> season of 2007 as our baseline of comparison.  
138 Abatement scenarios are defined by U.S.-wide, fixed-percentage reductions in (a) mobile  
139 (onroad and nonroad) *or* point source emissions (e.g., a 20% reduction in all mobile source  
140 emissions only), or (b) *both* mobile and point source categories simultaneously (e.g., a 20%  
141 reduction in all mobile and point source emissions). Scenarios of 20, 40, 60, 80, and 100%  
142 reductions in emissions of all species from either source category are used. For each scenario,  
143 2007 emissions are perturbed by a specified percentage in the forward CMAQ model.  
144 Concentration outputs from the forward model are used to calculate a new set of adjoint forcing  
145 terms (details are available elsewhere)<sup>6</sup> and for calculating adjoint-based MBs in the backward  
146 model.

147 We categorize MBs for NO<sub>x</sub> emitted from (1) any mobile source and (2) any point source in a  
148 given grid cell in the domain. We report MBs for 1 ton of NO<sub>x</sub> emitted over the O<sub>3</sub> season  
149 according to the spatiotemporal (i.e., day-to-day and layer-by-layer) distribution of emissions for  
150 any given source location. Mobile source MBs are thus calculated for surface-level emissions  
151 only, while point source MBs are proportionally integrated over all vertical model layers whose  
152 emissions are non-zero, according to

$$MB_{\omega} = \frac{\sum_t \sum_z \frac{\partial J}{\partial e_{\omega z t}} e_{\omega z t}}{\sum_t \sum_z e_{\omega z t}} \quad (2)$$



153 where  $MB_{\omega}$  is the  $\text{NO}_x$  MB for a mobile or point source in location  $\omega$ . MBs for a given grid  
154 cell are emission-weighted averages over all vertical model layers,  $z$ , and all simulation times,  $t$ ,  
155 in that location. Adjoint sensitivities,  $\partial J/\partial e_{\omega z t}$ , are outputs of the CMAQ-adjoint model and  
156 indicate the sensitivity or response of U.S.-wide mortality to  $\text{NO}_x$  emitted in location  $\omega$ , at layer  
157  $z$ , for time  $t$ . Adjoint sensitivities are scaled to amount to the influence of 1 ton of  $\text{NO}_x$  emitted  
158 over the  $\text{O}_3$  season. We note that equation (2) applies only to the first layer for mobile sources,  
159 but is integrated over all vertical model layers for point sources. As the adjoint method provides  
160 sensitivity information specific to each location, layer, and time of emission release, the  
161 distinction between mobile and point source MBs comes from emission weighting in equation  
162 (2). When depicting point source MBs, we apply a filter to exclude small point sources ( $\text{NO}_x$   
163 emissions < 100 ton/season).

164 We note that adjoint-based MBs indicate how emissions generated in one location contribute  
165 to a change in nationwide  $\text{O}_3$  exposure somewhere along their trajectory, but that the adjoint  
166 method cannot specify where such changes in exposure occur within the boundaries of the U.S.  
167 (as defined by the adjoint cost function in equation (1)). Our estimations of  $\text{NO}_x$  MBs are  
168 therefore representative of the nation-wide public health benefit in the U.S. attributed to a 1 ton  
169 reduction in  $\text{NO}_x$  from a given source.

170 RESULTS AND DISCUSSION. Mobile and point-MBs across the U.S. are estimated to average  
171 \$13,200 and \$14,100/ton, respectively, at baseline 2007 emission levels (Figure 1A-B). For  
172 mobile sources, MBs at baseline 2007 emission levels range from -\$86,000/ton to \$87,000 per  
173 ton of  $\text{NO}_x$  emitted near New York, NY and upwind of Los Angeles, CA, respectively (Figure  
174 1A). For point sources,  $\text{NO}_x$  MBs range from -\$20,000 to \$39,000/ton at baseline (Figure 1B).  
175 Our estimates at baseline are comparable to those found by others using various photochemical

176 modeling tools and approaches.<sup>4,6,18-19,22</sup> For example, Mauzerall et al.<sup>18</sup> used forward sensitivity  
177 analysis in an air quality model and found O<sub>3</sub>-based MBs of \$10,700-\$52,800/ton for large point  
178 sources in the eastern U.S.

179 Our estimates of mobile- and point-MBs are spatially heterogeneous and show similar behavior  
180 despite differences in the vertical layers of emission release (i.e., surface vs. elevated layers).  
181 Our findings therefore suggest that location is a stronger predictor of O<sub>3</sub>-based NO<sub>x</sub> MB than  
182 source category. We find that positive MBs in Figure 1 are widespread across low-NO<sub>x</sub>  
183 environments in the U.S. Negative MBs, or disbenefits,<sup>6</sup> are localized in various urban areas and  
184 are due to the chemistry of O<sub>3</sub> production in NO<sub>x</sub>-rich (or NO<sub>x</sub>-inhibited) environments.

185 The dominant feature in Figure 1 is the widespread increase in NO<sub>x</sub> MBs towards higher levels  
186 of abatement. Without exception, positive MBs become more positive and MBs that are initially  
187 negative (i.e., disbenefits) become less so – and eventually positive – with U.S.-wide reductions  
188 in emissions. In other words, as the relative abundance of NO<sub>x</sub> declines with added controls, each  
189 additional ton of NO<sub>x</sub> reduction carries larger benefits than the previous ton. This trend exists at  
190 all locations across the domain for both source categories. Such behavior is due to the role of  
191 NO<sub>x</sub> availability in O<sub>3</sub> production. When NO<sub>x</sub> is abundant, competition between NO<sub>x</sub> molecules  
192 is high, yielding a small impact of increased NO<sub>x</sub> availability on O<sub>3</sub>. As less NO<sub>x</sub> becomes  
193 available for reactions to produce O<sub>3</sub>, additional NO<sub>x</sub> molecules face little competition and have  
194 higher O<sub>3</sub> formation efficiency, yielding larger MBs.

195 Depiction of MB as a function of emission reduction (abatement) level (a MB or MD curve)  
196 yields insight about the predicted benefits of added controls. A mix of MB curves for select,  
197 individual urban areas and point sources in the U.S. demonstrate the spectrum of behavior seen  
198 across different chemical environments in varying proximity to population centers (Figure 2).

199 Mobile source MBs (Figure 2A-B) and point source MBs (Figure 2C-D) rise invariably,  
200 monotonically, and nonlinearly as nation-wide emission levels decline from the 2007 baseline.  
201 MBs increase by 2-30 times their initial value, and by as much as \$169,000/ton with continued  
202 abatement of both source categories. The nonlinearity in the total damage function implied in  
203 these plots indicates a changing atmospheric regime as the abundance of  $\text{NO}_x$  progressively  
204 declines. Such a shift can eventually amount to a change in MB sign (i.e., from negative to  
205 positive) for environments that are initially  $\text{NO}_x$ -inhibited. One example is Los Angeles (LA in  
206 Figure 2A-B), whose mobile-MB at baseline is estimated to be -\$17,000/ton and grows rapidly to  
207 \$152,000/ton with 100% abatement (Figure 2B). Given that vehicles are by far the dominant  
208 source of anthropogenic emissions in and around LA, its MB is very sensitive to mobile source  
209 abatement (Figure 2A). MB behavior depicted for LA is among the most extreme of any source  
210 across the U.S. due to (1) the initially  $\text{NO}_x$ -inhibited environment necessitating a transition  
211 through the  $\text{O}_3$  ridge into a  $\text{NO}_x$ -limited regime with abatement, (2) the large populations in and  
212 downwind of LA, and (3) the lack of large point sources in the region that lends little change in  
213 MB with point source abatement (Figure 2A). The spectrum of behavior depicted in Figure 2  
214 shows, without exception, that as  $\text{NO}_x$  approaches background levels, changes in MBs become  
215 more drastic with each additional unit of abatement.

216 System-wide average MB curves represent the overall response of  $\text{O}_3$  health damages in the  
217 U.S. population to a 1 ton reduction in  $\text{NO}_x$  from an average emitter. We calculate system-wide  
218 average mobile- and point-MB curves for separate and combined reductions in source categories  
219 (Figure 3). System-wide average MBs are calculated using emission-weighted averaging of MBs  
220 in Figure 1 for all sources. On an aggregate level, MBs are positive, upward-sloping, and rise  
221 from baseline monotonically and nonlinearly with  $\text{NO}_x$  emission controls of increasing intensity.

222 Contrary to traditional depictions of MB curves, NO<sub>x</sub> MBs increase substantially as background  
223 concentrations are approached, indicating a heightened sensitivity of pristine environments to  
224 any added NO<sub>x</sub>. With combined reductions in both mobile and point source categories, NO<sub>x</sub> MBs  
225 increase roughly 3-4 times (from \$13,000 to \$51,000/ton for mobile-MB, and from \$14,000 to  
226 \$45,000/ton for point-MB) after 100% emission abatement. Mobile-MBs are more sensitive to  
227 abatement of mobile source emissions, while point-MBs are similarly affected by either type of  
228 control.

229 The prevalent presumption of a downward-sloping MB curve in the environmental economics  
230 literature is akin to convexity of the cumulative or total damage curve with respect to abatement.  
231 Total damage in this context is the monetized U.S. health burden from O<sub>3</sub> exposure at a given  
232 abatement level. Our estimations of MB curves indicate a consistently concave NO<sub>x</sub> total damage  
233 curve with compounding benefits towards lower levels of emissions (Figure 4). In other words,  
234 the total damage depicted in Figure 4 declines more rapidly towards higher levels of abatement.  
235 Past studies<sup>20,34-35</sup> have assumed that MBs for a specific source do not change with NO<sub>x</sub>  
236 emissions, and estimated total damage by multiplying fixed MBs and emissions. This linear  
237 approximation of the total damage curve is prone to underestimation as it neglects its curvature  
238 as emissions change. Our finding of a strictly concave total damage curve applies to all sources,  
239 rather than to specific cases of sources with negative MBs at baseline as suggested previously.<sup>15</sup>  
240 Further, our findings suggest a smooth and gradual transition in O<sub>3</sub>-based NO<sub>x</sub> benefits across  
241 chemical regimes, contrary to discontinuities or instantaneous changes suggested by others.<sup>1,36</sup>

242 Closer examination of Figures 3-4 illustrates an important point about nonlinearity and  
243 curvature of the total damage function. The benefits of controlling both mobile and point source  
244 categories together (solid line in Figure 4) are larger than the summation of benefits incurred

245 from controlling these sources separately (long-dashed line in Figure 4). This nonadditivity is a  
246 result of the concave nature of the  $\text{NO}_x$  total damage curve that becomes more pronounced as the  
247 overall abundance of  $\text{NO}_x$  declines. Combined reductions in both mobile and point sources,  
248 together rather than separately, results in a more extreme  $\text{NO}_x$ -limited environment where each  
249 additional ton of  $\text{NO}_x$  gains higher efficiency for  $\text{O}_3$  production. In the presence of regional-to-  
250 national scale emission controls from many polluters across different sectors, a simple addition  
251 to estimate the overall benefits of abatement is likely to underestimate the combined effect. We  
252 note that the quantitative results shown in this work are based on emission reduction scenarios  
253 that apply nation-wide, fixed percentage reductions in point and/or mobile source emissions. For  
254 a specific policy targeting only a subset of sources (e.g., on-road gasoline vehicles),  $\text{NO}_x$  MBs  
255 would increase with abatement, but at a lower rate. Our results also show that evaluating such  
256 policy options in isolation from the larger emission reduction landscape is likely to  
257 (significantly) underestimate the benefits of abatement.

258 Benefit-cost assessment relies on estimates of MB and the cost-per-ton of emission reduction  
259 (referred to as marginal [abatement] cost, or MC) as decision-making metrics. Based on  
260 economic equilibrium theory, the net societal benefit of a given policy item is highest when MB  
261 equals MC ( $A^*$  in Figure 5).<sup>1,37-38</sup> At lower abatement levels than this equilibrium point (to the  
262 left of  $A^*$  in Figure 5), there is incentive to further control emissions as the incremental benefit  
263 exceeds the cost. At higher abatement levels than  $A^*$ , rising costs are prohibitive and no longer  
264 compensated in full by expected returns. Traditional depictions of this equilibrium point assume  
265 a downward-sloped MB curve and an upward-sloped MC curve with abatement. Our findings of  
266 an upward-sloping and monotonic  $\text{NO}_x$  MB curve challenge the conventional scheme presented  
267 in Figure 5 in two important ways. First, if the MB curve is upward-sloping and nonlinear, as in

268 Figures 2-3, the uniqueness of the equilibrium point, as often presumed in the environmental  
269 economics literature, is not guaranteed and will depend on the shape of the total damage and cost  
270 curves.<sup>15</sup> Second, in the presence of an upward-sloped MB curve, an economically viable  
271 abatement policy at baseline (i.e.,  $MB > MC$ ), would yield a new intersection point that lies at a  
272 higher abatement level ( $A_{new}^*$  in Figure 5) than that suggested by a conventionally convex total  
273 damage curve. Our results, in most cases, are therefore in support of more stringent emission  
274 reduction targets than previously thought to be economically efficient. One example is the  
275 emission cap of the U.S. cap-and-trade program. Upward-sloping MB curves, such as those  
276 found in this study, would provide economic incentive for a lower system-wide emission cap  
277 than previously envisioned. The general shape of the MB curve in Figure 5 is taken from our  
278 results (i.e., Figure 3); however, we emphasize that it is a qualitative depiction. Though strictly  
279 qualitative, Figure 5 demonstrates that a shift in the economic paradigm, from convexity to non-  
280 convexity, would entail an important change in the MB curve, and a correspondingly significant  
281 shift in the point of economic equilibrium.

282 We note that our conclusions apply generally to the overall system and not necessarily to each  
283 source individually, as the shapes of MB and MC curves differ from source to source. We also  
284 recognize that the MB curves presented here are based on a series of U.S.-wide emission  
285 reductions and capture responses of MBs to national rather than local changes in emission  
286 patterns. Reductions in emissions from single sources, in most cases, would have little tangible  
287 impact on the ambient availability of  $NO_x$  in the system when other emissions are kept constant.  
288 MB curves for single sources are thus expected to be relatively flat compared to the curvature  
289 seen in Figures 2-3. Changes in sectoral emissions, such as mobile or electricity generating  
290 sources, seldom happen in isolation and commonly materialize within a broader, nationwide

291 context. As such, we believe that our depiction provides a more realistic and relevant view of  
292 MB behavior for decision-making. In the particular case of regulating sources with negative  
293 MBs, a broader consideration of system- or sector-wide abatement and resulting benefits is  
294 preferable to isolating the impacts of abatement of individual sources.<sup>39</sup> Information garnered  
295 from the total damage/benefit curve, such as those in Figure 4, can yield important insight into  
296 the cumulative benefits of widespread emission control policies.

297 The concave (or nonconvex) behavior demonstrated here is for a NO<sub>x</sub> damage function based  
298 only on mortality from short-term O<sub>3</sub> exposure. More comprehensive estimation of NO<sub>x</sub> MBs  
299 would consider non-fatal health and other environmental impacts of O<sub>3</sub>, particularly endpoints  
300 related to long-term exposure. In addition to influencing O<sub>3</sub> production, NO<sub>x</sub> also contributes to  
301 secondary PM formation. We note that our O<sub>3</sub>-based MB estimates are comparable in magnitude  
302 to estimates based on PM<sub>2.5</sub>. Fann et al.<sup>4</sup> used reduced-form air quality modeling to estimate NO<sub>x</sub>  
303 MBs that account for chronic PM<sub>2.5</sub> exposure mortality and morbidity in the U.S. population. In  
304 the study, NO<sub>x</sub> MBs averaged \$10,000/ton for mobile sources and \$9,700-15,000/ton for point  
305 sources over 9 urban areas of the U.S. A later, more detailed study by Fann et al.<sup>19</sup> employed  
306 source apportionment in an air quality model to estimate MBs (termed benefits-per-ton) and  
307 found lower estimates averaging \$4,500/ton and \$3,700/ton for mobile sources and power plants  
308 in the continental U.S. Although the overall public health burden of PM<sub>2.5</sub> is larger than that of  
309 O<sub>3</sub>,<sup>40</sup> our comparison suggests that NO<sub>x</sub> emissions may incur as much or more damage through  
310 O<sub>3</sub> in the short term as in the long term through PM<sub>2.5</sub>. MBs that include long-term health  
311 impacts of O<sub>3</sub><sup>41</sup> are likely to be significantly larger than our estimates, and would thus have a  
312 dominant share of the total benefits of NO<sub>x</sub> control. Non-convexity induced by O<sub>3</sub> would  
313 therefore likely extend to non-convexity in the overall damage curve.

314 Though no studies have fully tested the assumption of convexity as applied to PM health  
315 damages, indications of two forms of non-convexity exist in the literature. The first is non-  
316 convexity due to the role of chemical equilibrium in formation of secondary inorganic PM  
317 constituents from NO<sub>x</sub>. Fann et al.<sup>19</sup> reported consistently higher MBs for all inorganic PM  
318 precursor emissions under a 2016 abatement scenario compared to estimates for 2005 emission  
319 levels. It is noteworthy that the authors found (slightly) increased MBs even for primary  
320 emissions of PM, possibly due to nonlinearity induced by other species through aerosol growth  
321 and dynamics. Holt et al.<sup>42</sup> compared PM sensitivities to NO<sub>x</sub>, SO<sub>2</sub>, and NH<sub>3</sub> emissions in 2005  
322 and 2012 and found that for SO<sub>2</sub> and NO<sub>x</sub>, sensitivities increase with emission controls. Zhang et  
323 al.<sup>43</sup> used the high-order direct decoupled method (HDDM)<sup>44</sup> to estimate 2<sup>nd</sup> order derivatives of  
324 PM with respect to precursor emissions, including NO<sub>x</sub>. They found mostly negative 2<sup>nd</sup>-order  
325 HDDM sensitivities, indicative of a concave response surface.

326 In addition to non-convexity in the atmospheric response of PM to NO<sub>x</sub>, recent studies have  
327 suggested that unlike O<sub>3</sub>,<sup>45</sup> a non-linear and concave concentration-response function may be  
328 more suitable for PM<sub>2.5</sub>,<sup>46-47</sup> implying an epidemiologically induced non-convex damage  
329 curve.<sup>48-50</sup> A supralinear or concave curve implies a large slope, or high incremental risk per unit  
330 concentration, at low levels of exposure that diminishes towards higher concentrations. Such a  
331 shape of the concentration-response function indicates a heightened sensitivity of populations to  
332 PM in cleaner environments. Combined with the likely non-convex atmospheric response of PM  
333 to NO<sub>x</sub>, persisting, or even enhanced concavity, may be expected with inclusion of PM in the  
334 damage function. Future research is required to disentangle the interactions between these two  
335 sources of non-convexity for PM.



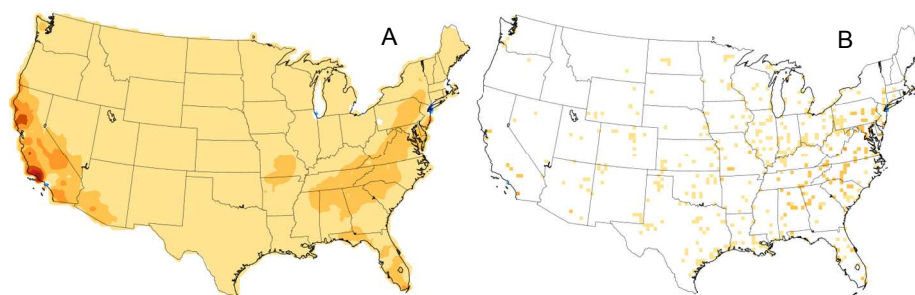
336 Our MB estimates are affected by uncertainties stemming from atmospheric modeling and  
337 emissions characterization, population demographics, epidemiological concentration-response  
338 relationships, and economic valuation of damage endpoints. Firstly, we estimate MB curves at a  
339 36-km horizontal resolution that may not capture fine spatial gradients in O<sub>3</sub> exposure,  
340 particularly over urban and suburban areas. Second, we use population and mortality data for  
341 2007 without considering dynamic changes in population that may become relevant into the  
342 future. Third, we apply a uniform effect estimate to the entire U.S. population, while recognizing  
343 that effect estimates may vary by region.<sup>33</sup> We also assume a linear, no-threshold response of  
344 mortality to O<sub>3</sub> exposure based on the current epidemiological literature.<sup>44</sup> Alternate forms of the  
345 concentration-response function would affect NO<sub>x</sub> MB estimation along the abatement  
346 trajectory. Fourth, while we assign a uniform value of a statistical life for valuating public health  
347 impacts, this willingness-to-pay may differ among subgroups of the population and shift as  
348 pollution levels and consumer preferences change. We note that we use 2007 emissions as our  
349 reference point, and MBs at current emission levels, or those under planned policies, may differ  
350 from estimates reported here, particularly given the progressive post-2007 emission reductions  
351 that have taken place.<sup>51</sup> We also note that our estimates of NO<sub>x</sub> MBs consider the impact of NO<sub>x</sub>  
352 control on the U.S. population only. In reality, emissions generated within the U.S. may also  
353 impact public health in other nations,<sup>6,52</sup> and thus marginal reductions in emissions may have  
354 additional monetary benefits not captured here. Interpretation of our results should consider these  
355 uncertainties and limitations of our analysis.

356 Our findings suggest compounding benefits for progressive NO<sub>x</sub> emission reductions. The  
357 benefit of urban NO<sub>x</sub> control has been debated for cities with negative MBs at current emission  
358 levels, where localized emission reductions appear unfavorable in the short-term.<sup>6,15</sup>

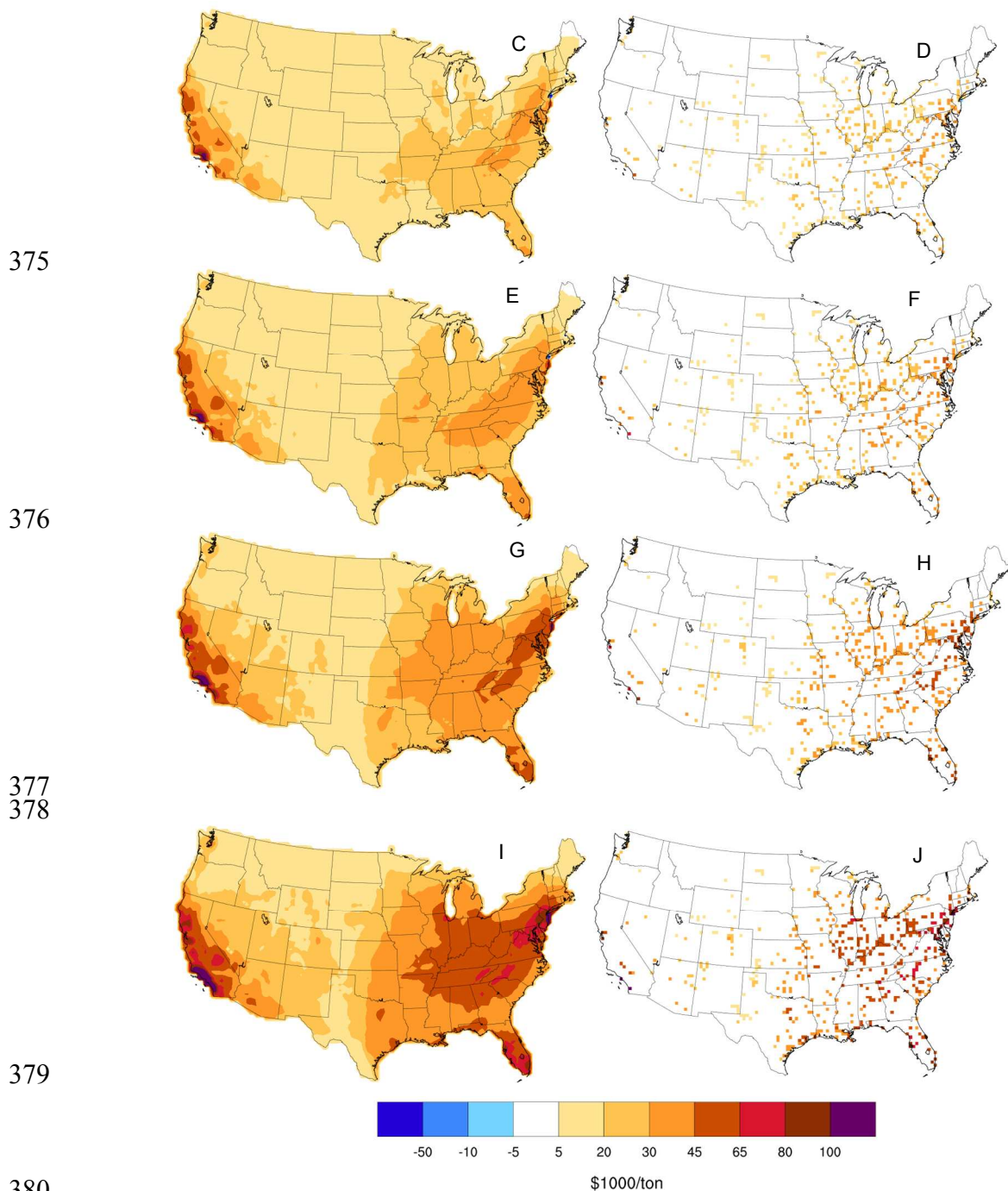
359 Compounding benefits with added  $\text{NO}_x$  control on a broader scale support continued  $\text{NO}_x$   
360 abatement in the longer term for urban air quality management. Strictly concave total damage  
361 functions and upward-sloping MB curves with abatement, such as those found here, suggest  
362 larger yet unexplored economic incentives for more aggressive emission reductions.

363 As discussed earlier, our findings of non-convexity related to  $\text{NO}_x$  and  $\text{O}_3$  are likely to extend  
364 to inorganic PM and its precursors such as  $\text{SO}_2$ . Given the challenges that  $\text{O}_3$  and PM pose to air  
365 quality management in North America and the world over, we believe that the notion of  
366 generally non-convex behavior for secondary pollutants such as  $\text{O}_3$  and inorganic PM has  
367 important policy implications. Reported emission trends from the U.S. EPA suggest that  
368 anthropogenic  $\text{NO}_x$  emissions have decreased by more than 30% from 2007 to 2014.<sup>51</sup> Based on  
369 our results, this level of reduction could place us on the onset of an important point in time and  
370 on the MB curve, where  $\text{NO}_x$  MBs can increase significantly in the near future (Figure 4). In  
371 such a policy context, adhering to the traditional view of convexity and disregarding the  
372 compounding nature of  $\text{NO}_x$  control benefits does not appear to be a prudent option.

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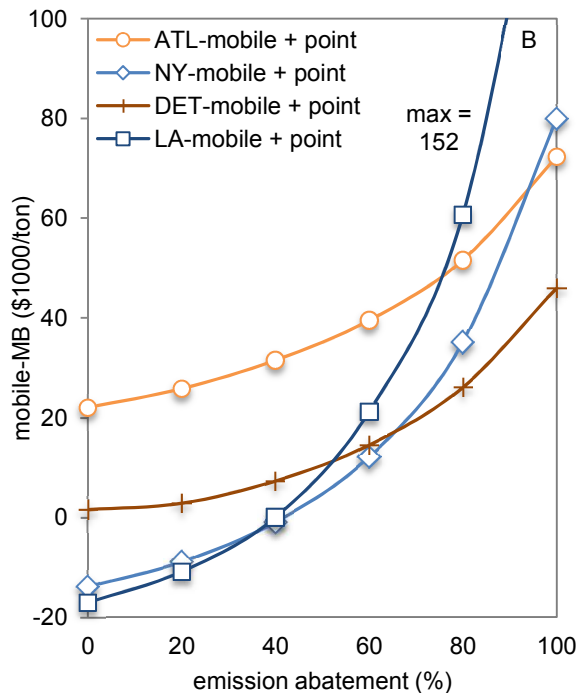
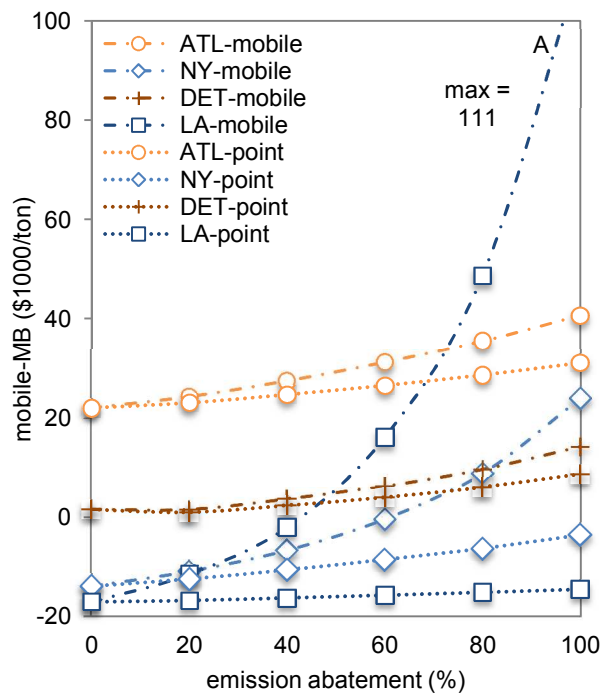


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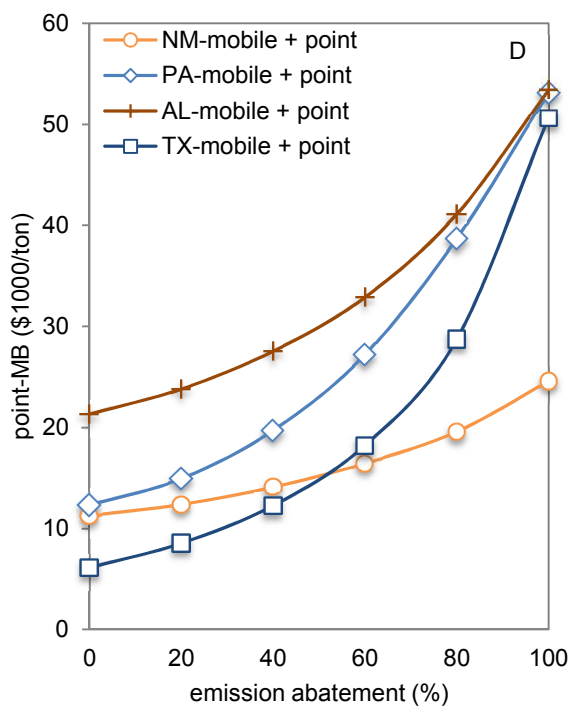
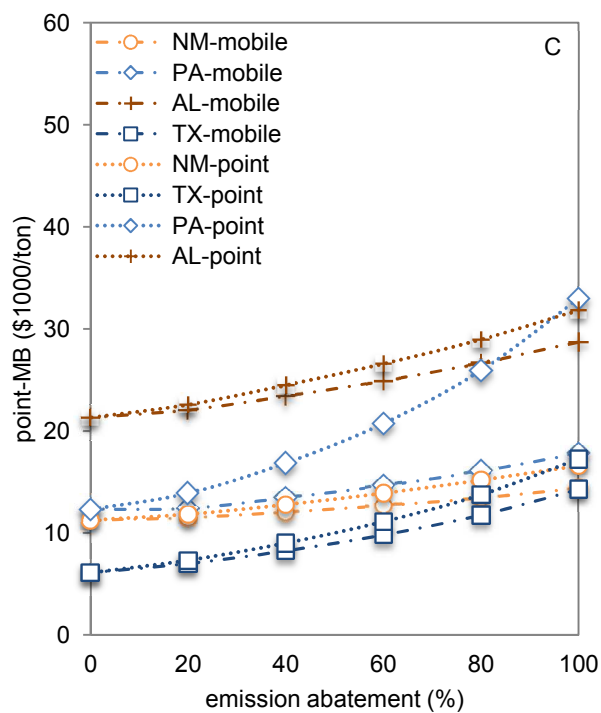


380  
381 **Figure 1.** Simulated MBs for NO<sub>x</sub> emitted from mobile sources (left panel) and point sources  
382 (right panel) across the U.S. MBs are shown for baseline 2007 emission levels (A-B) and for  
383 U.S.-wide abatement of all species emitted from both mobile and point source categories in  
384 amounts of 40% (C-D), 60% (E-F), 80% (G-H), and 100% (I-J). MBs are for 1 ton of NO<sub>x</sub>  
385 emission allocated over the 2007 O<sub>3</sub> season (May-September) according to the spatiotemporal

386 distribution of emissions. MB values are only shown for point sources (B, D, F, H, J) whose  
 387 emissions are more than 100 ton/season at baseline.



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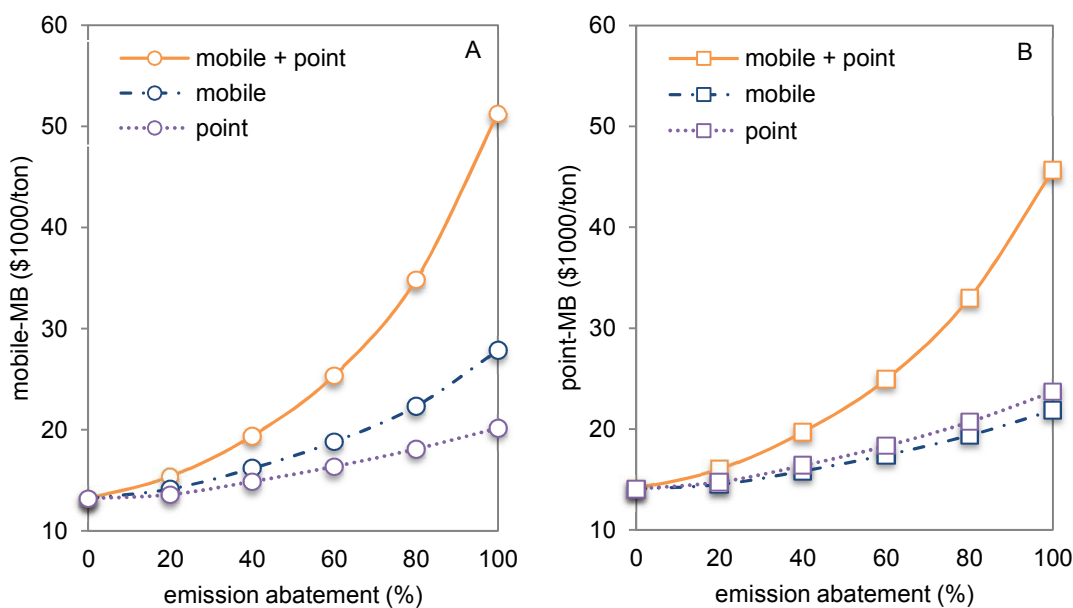


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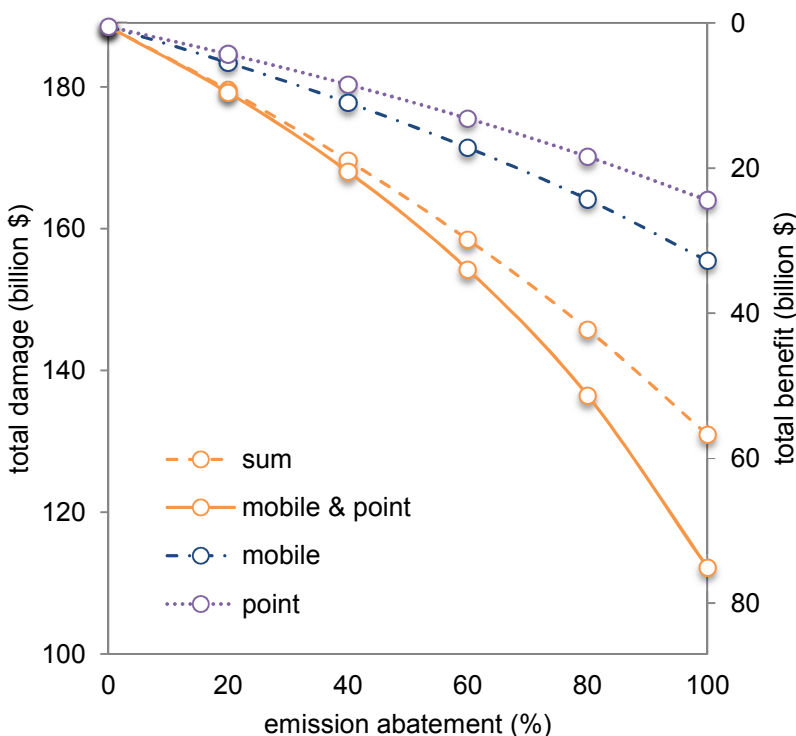
391 **Figure 2.** Simulated  $\text{NO}_x$  MBs as a function of U.S.-wide abatement level for a sample of source  
 392 locations. Mobile-MBs (A-B) are the benefits associated with reductions in  $\text{NO}_x$  emitted from  
 393 mobile sources within the specified city (Atlanta (ATL), New York (NY), Detroit (DET), Los  
 394 Angeles (LA)). Point-MBs (C-D) are the benefit associated with reductions in  $\text{NO}_x$  emitted from  
 395 an anonymous, major point source in the specified state (NM, PA, AL, TX). Hatched and dashed  
 396 lines (A, C) depict MBs for 0-100% abatement of all species emitted from mobile or point  
 397 sources, respectively, across the U.S., as compared to 2007 levels. Solid lines (B, D) show the  
 398 same for simultaneous reductions in both mobile and point sources. For example, the “LA-point”  
 399 dashed line in (A) shows mobile-MBs at different levels of U.S.-wide point source abatement.

400



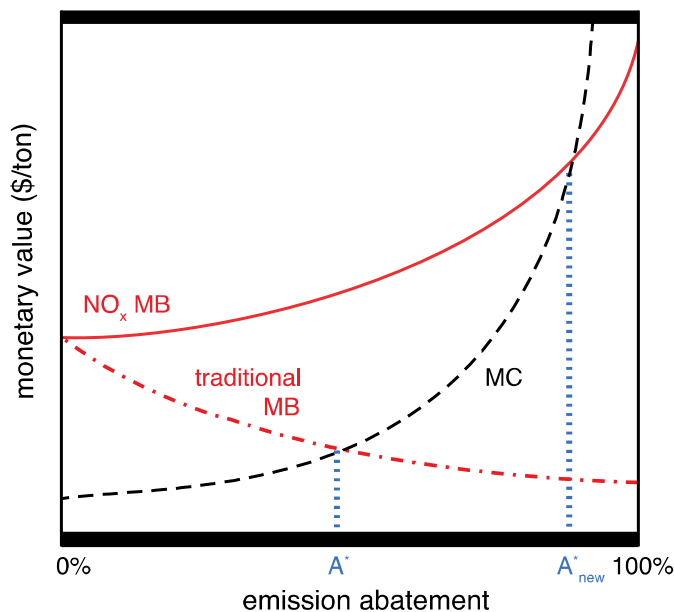
401 **Figure 3.** Average U.S.-wide mobile- (A) and point-MB curves (B) for various levels of U.S.-  
 402 wide abatement of all species emitted from mobile and point sources. Average MB curves are  
 403 depicted as a function of mobile source abatement (hatched line) and point source abatement  
 404

405 (dashed line) separately. Solid lines depict the combined rise in MBs from controlling both  
 406 source categories simultaneously. MBs shown here are emission-weighted averages over the  
 407 U.S.



408  
 409 **Figure 4.** Total U.S.-wide damage as a function of U.S.-wide abatement of mobile sources  
 410 (hatched line), point sources (short-dashed line), and both simultaneously (solid line). Total  
 411 damage is the monetized health burden of mortality attributable to short-term O<sub>3</sub> exposure of the  
 412 U.S. population, calculated at each abatement level. Total benefit shown on the secondary axis is  
 413 the avoided health damage in moving from the 2007 baseline to lower emission levels. The long-  
 414 dashed line depicts total benefits as the summation of benefits incurred from controlling mobile  
 415 and point source emissions separately (i.e., the summation of benefits for the short-dashed and  
 416 hatched lines). Total damage accounts for O<sub>3</sub> exposure during the 2007 O<sub>3</sub> season (May-  
 417 September).

418



419

420 **Figure 5.** Depiction of the economic equilibrium point ( $A^*$ ) between MB and MC (dashed line)  
421 based on traditional forms of MB curves (hatched line) and our findings (solid line). We consider  
422 2007 as our baseline and the starting point for MB curves. Curves shown here are qualitative and  
423 for demonstrative purposes only and are based on the general shape of system-wide average  
424 curves in Figure 3. Note that the baseline-level MC is often less than the MB, and changes in the  
425 shape of either curve will affect where the points of equilibrium lie.

426 ASSOCIATED CONTENT

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### 433 **Author Contributions**

434 The manuscript was written through contributions of all authors. All authors have given approval  
435 to the final version of the manuscript.

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### 439 **Notes**

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441 ABBREVIATIONS

442 MB, marginal benefit; MD, marginal damage; VOC, volatile organic compound; CMAQ,  
443 Community Multiscale Air Quality model; NEI, National Emission Inventory; NPRI, National  
444 Pollutant Release Inventory; SMOKE, Sparse Matrix Operator Kernel Emissions model; WRF,  
445 Weather Research and Forecasting model; MCIP, Meteorology Chemistry Interface Processor;  
446 MFE, mean fractional error; MFB, mean fractional bias; DM8A, daily maximum 8 h average;  
447 CDC, Centers for Disease Control and Prevention; MC, marginal cost; PM, particulate matter.

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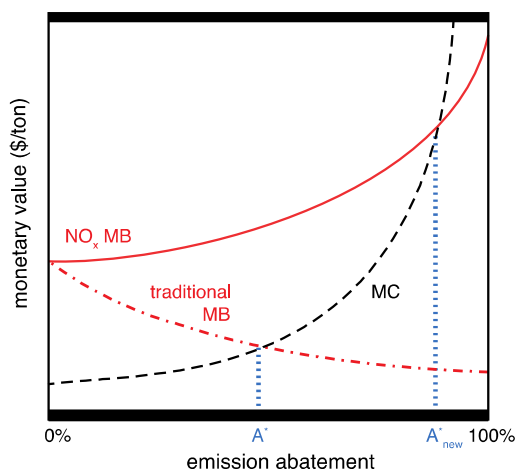
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