



Kevin Maggay
Energy and Environmental Policy
555 W. 5th Street
Los Angeles, CA 90013
tel: 213-244-8192
Email: kmaggay@semprautilities.com

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Dr. Sam Pournazeri
Chief of Mobile Source Analysis Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Submitted electronically to Sam.Pournazeri@arb.ca.gov

Subject: Comments on the Draft 2020 Mobile Source Strategy

Dear Dr. Pournazeri,

SoCalGas appreciates the opportunity to comment on the California Air Resource Board's (CARB) Draft 2020 Mobile Source Strategy (Draft 2020 MSS). The Draft 2020 MSS is key to identifying the appropriate pathways and technology mixes to meet the State's complex near-term air quality goals and long-term climate goals. In the spirit of collaboration, offer the following comments for your consideration.

CARB Must Identify and Implement Measures to Achieve Near-Term Emission Reductions To Meet Upcoming Federal Clean Air Act Deadlines and Protect Public Health

At the December 2020 CARB Board meeting, Staff presented an update of the Draft 2020 MSS. Former Chair Nichols directed Staff to explore strategies that would result in near-term emission reductions to help meet near-term attainment deadlines.¹ At the May 6, 2021 workshop, Staff highlighted the new near-term measures that were not part of the 2016 State Implementation Plan. These new measures are listed below with their estimated tons per day of nitrogen oxide (NOx) emission reductions in the South Coast Air Basin (SCAB).

New Measure	Implementation Date	Emission Reductions in the SCAB in 2023 (TPD)
Zero-Emission Drayage and Advanced Clean Fleet	2021	0
In-Use Locomotive	2022	0

¹ December 2020 CARB Board Meeting Transcript, at 163. Available at <https://ww3.arb.ca.gov/board/mt/2020/mt121020.pdf>.

Commercial Harbor Craft	2021	0.9
Cargo Handling Equipment	TBD	0.1
Construction & Mining	TBD	<0.1
	Total	1.0

As shown in the table, only approximately one ton per day (tpd) is expected to be reduced from the new measures, collectively. Additionally, two of the new measures have implementation dates that are yet to be determined. It is speculative that any reductions will be achieved to help the SCAB meet attainment of the eight-hour 1997 ozone by 2023 (the federally imposed deadline). Further, heavy-duty trucks (Class 2 through 8) are a major source of NOx, accounting for 31 percent of the basin-wide NOx emissions.² Yet, the draft does not identify any new measures to reduce truck emissions prior to 2023.

It should be noted that at the May 6 workshop, Staff expressed that they “do not foresee a viable pathway to meeting 2023 attainment” (transcript and video not available). While 2023 attainment will be a significant challenge, we observe that meeting the attainment deadline would enhance and protect public welfare, and respectfully urge CARB to identify and implement measures to get meaningful emission reductions, particularly from trucks. The potential consequences of a failure to reach attainment, especially insofar as impeded by an inadequate mobile source strategy, could cause significant hardship to California and its economy. As CARB is well aware, the Clean Air Act provides for EPA preparation of Federal Implementation Plan, the imposition of sanctions on the region, and/or withholding of federal funding.

In addition to the statutory requirement to achieve necessary emissions reduction by federal Clean Air Act deadlines, California has a public health imperative to address air pollution in communities that are disproportionately impacted by transportation emissions along transportation corridors. Commercially available technologies can be deployed today to get immediate emission reductions and provide immediate public health benefits. Regulatory determinations to effectively await for future measures and technologies essentially compel impacted communities to await air quality improvement as well.

CARB Must Confirm its Commitment to Turning Over 33,000 Trucks in the San Joaquin Valley by 2024

The most recent version of the Draft 2020 MSS added discussion of State and regional measures needed to meet attainment. However, the Draft 2020 MSS omits CARB’s commitment to turnover 33,000 heavy-duty trucks to near-zero emissions, or better, using incentives in the San Joaquin Valley by 2024. CARB committed to this action in the 2018 San Joaquin Valley State Implementation Plan (SIP) Supplement, which was approved by the Environmental Protection

² Joint CARB and SCAQMD Presentation, 16 December 2020. Available at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/presentation-2022-aqmp-mobile-sources-wg-final.pdf?sfvrsn=12>.

Agency (EPA).³ This measure is expected to reduce emissions by an astonishing 10 tpd of NO_x.⁴ In the workshop, a commenter asked Staff why the 33,000 trucks were not included in the presentation. Staff response was that the measure was omitted because it is an incentive measure, and the slide did not include incentive measures. The 33,000 trucks commitment was also not included in the Mobile Emissions Toolkit for Analysis (META) tool and thus not included in the emission calculations. Regardless of whether a measure is regulatory, or incentive based, CARB must make good on its commitments and include those commitments in its calculations and assumptions. It is imperative that CARB reaffirm and make good on its commitment to turning over 33,000 heavy-duty trucks to near-zero emission, or better. The residents of the San Joaquin Valley are relying on this measure to reduce emissions by 10 tpd NO_x to not only meet attainment, but to improve public health.

CARB Should Examine Alternative Pathways

Throughout the Draft 2020 MSS development process, it is disappointing that alternative scenarios to meet the State's near-term air quality goals and long-term climate goals, were not expressed or entertained. In previous comments, SoCalGas presented for alternatives to be evaluated. To date, no feasible alternative pathways have been assessed. Each iteration of the Draft 2020 MSS has solely focused on a zero-emission pathway and as stated by the South Coast Air Quality Management District (SCAQMD) the Draft 2020 MSS “does not address the significant NO_x emission reductions needed for attaining the 1997 eight-hour ozone attainment in the basin in 2023.”⁵ A consulting firm, Ramboll, recently completed an alternatives analysis that looked at multiple technology pathways that could achieve all of the State's goals. The study found that “expanded implementation of zero-emission and low-NO_x vehicles, coupled with increased introduction of renewable liquid and gaseous fuels, can deliver earlier and more cost-effective benefits than a ZEV only approach.”⁶ The study also found that “near-term NO_x reductions and long-term GHG goals can be achieved with a mix of advanced low-emitting trucks and renewable fuels.”⁷

In addition to the challenges of meeting attainment of the federal 1997 eight-hour ozone standard of 80 parts per billion (ppb) by 2023, the SCAQMD states that “based on our preliminary review of the Draft 2020 MSS, it appears that the total projected reductions from all scenarios for all mobile source categories will not be adequate for 2031 attainment,”⁸ which is the federal 2008 eight-hour ozone standard of 75-ppb. CARB must look at alternatives with multiple technology pathways to get real emission reductions to meet not only 2023 attainment but 2031 as well.

³ Federal Register: [2020-14471.pdf](https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-14471.pdf) (govinf <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-14471.pdf>)

⁴ San Joaquin Valley Supplement to the Revised 2016 State Strategy for the State Implementation Plan, August 2018. Available at: https://ww3.arb.ca.gov/planning/sip/sjvpm25/2018plan/20180828_sjv_supplement_sip_strategy.pdf.

⁵ Letter from SCAQMD Executive Officer to CARB Executive Officer dated October 20, 2020.

⁶ Ramboll, *Multi-Technology Pathways to Achieve California's Air Quality and Greenhouse Gas Goals: Heavy-Heavy-Duty Truck Case Study*, 2021, at 25.

⁷ Ibid.

⁸ Letter from SCAQMD Executive Officer to CARB Executive Officer dated October 20, 2020.

Thank you again for the opportunity to comment on the Draft 2020 MSS. We hope to continue to work with CARB in developing the Draft 2020 MSS to address the State air quality and climate challenges.

Respectfully,

A handwritten signature in black ink, appearing to be 'KM' or similar initials, written in a cursive style.

Kevin Maggay
Program Manager
Energy and Environmental Policy

cc:

Ariel Fideldy
Sarah Foresttieri
Sylvia Vanderspek