



October 21, 2020

Dr. Michael Benjamin, Chief
Air Quality Planning and Science Division
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Draft CARB 2020 Mobile Source Strategy

Dear Dr. Benjamin:

The San Joaquin Valley faces one of the most significant air quality challenges in the country due to its unique topography and geography, and is currently in nonattainment with the latest federal ozone and PM_{2.5} standards. The Valley's topography, climate, geography, and the presence of two major transportation corridors connecting Northern and Southern California all contribute to the region's air quality challenges. This difficult air quality challenge creates a significant public health challenge for Valley residents. The San Joaquin Valley is also home to a large number of the state's disadvantaged communities, including 20 of the 30 most disadvantaged communities in California. Three of those communities were selected have been selected as priority communities for action under the AB 617 Community Air Protection Program.

Building on past air quality efforts, the San Joaquin Valley Air Pollution Control District (District), in partnership with the California Air Resources Board (CARB), recently adopted the *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards (2018 PM_{2.5} Plan)* that outlines the actions necessary for further improving the Valley's air quality and meeting the federal air quality standards for PM_{2.5} by the applicable deadlines of 2024 and 2025. Meeting these federal standards will not be possible without transformational technology deployment across all mobile sources, particularly from heavy duty vehicles and equipment that now make up the majority of emissions and toxics impacts in the San Joaquin Valley. Planning for attainment of the latest federal 8-hour ozone standards will necessitate even further control of NO_x emissions from mobile sources. Moving forward with these attainment efforts will be a major endeavor only achievable through a

Samir Sheikh

Executive Director/Air Pollution Control Officer

Northern Region

4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region

34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

collaborative approach with Valley residents and businesses, and significant support and investment at the local, state, and federal level. Given the severity of the Valley's air quality challenges and the need for ongoing emission reductions, CARB and the District have worked together to adopt the most stringent mobile and stationary source emissions control strategy in the nation. As a part of recent attainment planning efforts for the federal PM_{2.5} standards, the State committed to reduce an aggregate 32 tons per day (tpd) of NO_x and 1 tpd of PM_{2.5} by 2024/2025 in the Valley. These commitments were included in the *San Joaquin Valley Supplement to the 2016 State Strategy for the State Implementation Plan (2018 Supplement)*, adopted by CARB on October 25, 2018, and were approved by U.S. EPA into the State Implementation Plan on June 30, 2020.

The District appreciates CARB staff efforts and the opportunity to review the proposed 2020 Mobile Source Strategy (2020 MSS) and supports CARB adoption of mobile source measures that assist the Valley in meeting our collective air quality and public health goals. District staff appreciate CARB's recognition of the need for near-term emissions reductions in the San Joaquin Valley and South Coast air basins in portions of the draft 2020 MSS. However, District staff are concerned that the draft 2020 MSS does not sufficiently address the near-term emission reductions necessary to achieve attainment of federal health-based air quality standards in the San Joaquin Valley, as committed to by CARB in the federally-approved San Joaquin Valley SIP and *2018 Supplement*.

As an overall recommended guiding principle for developing the 2020 MSS, the District recommends that the 2024/2025 mobile source emissions reductions needed in the Valley are not included as "goals", but rather recognized as CARB commitments already included in the San Joaquin Valley's EPA-approved State Implementation Plan. While the 2020 MSS includes some recognition of the importance of near-zero emissions technology to achieve needed near-term reductions, particularly with respect to heavy duty trucks, the District recommends that the strategy more clearly articulate the importance of promoting near-zero and zero-emission technologies to address both near-term and long-term goals, as feasible. Furthermore, the District recommends that CARB more clearly articulate the existing commitments included in the *2018 Supplement* and *2018 PM_{2.5} Plan* that calls for the deployment of a combination of zero and near-zero technology as the most effective and achievable strategy for securing the needed near-term emissions reductions in the San Joaquin Valley and South Coast. To illustrate potential issues related to this recommendation, "Table 4 – Funding Needed through 2025" displays the funding amounts needed to accelerate the deployment of technologies for various sectors. Despite CARB's commitment and position that near-zero truck technology will be needed to meet heavy duty truck commitments in the San Joaquin Valley and South Coast (pages 32 and 33), Table 4 articulates the near-term transition as occurring through strictly zero-emission truck technologies.

The decreased availability of incentive funding in recent State budgets for clean air grant programs has raised concerns regarding the availability of resources needed to fully implement the measures in the 2016 Mobile Source Strategy and the *2018 Supplement*. Given these circumstances and significant need for funding to accelerate technology deployment, the District recommends that CARB reaffirm their commitment in the 2020 MSS to identify, and advocate for, the funding needed to continue to make progress towards meeting the incentive-based measure commitments outlined in the *2018 PM2.5 Plan*.

Lastly, the District is concerned with the minimal discussion and quantification about emission reductions from on-road mobile sources needed in the San Joaquin Valley. While the District appreciates CARB's focus on outlining the importance of emission reductions from agricultural equipment in the Valley, emissions reductions from on-road mobile sources represent the majority of NOx emissions in the region. The critical need for emission reductions from on-road sources in the Valley should be both recognized and discussed as a part of the 2020 MSS. District staff recommend that reductions expected to be achieved in the San Joaquin Valley through the implementation of on-road mobile source emission reductions measures be discussed and included in the 2020 MSS document, as well as in proposed modeling tools, including the Mobile Emissions Toolkit for Analysis (META).

The District thanks CARB for the opportunity to provide comments on the draft 2020 MSS, and for CARB's ongoing efforts to further reduce emissions from mobile sources operating within the San Joaquin Valley and across the State. If you have any questions, please contact Jessica Coria, Program Manager, at (559) 230-6000 or jessica.coria@valleyair.org.

Sincerely,



Jonathan Klassen
Director of Air Quality Science and Planning