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May 20, 2021

Richard Corey, Executive Officer
California Air Resources Board
1001 "I" Street, 6th Floor
Sacramento, CA 95814

Re: Draft 2020 Mobile Source Strategy

Dear Mr. Corey,

The California Air Pollution Control Officers Association (CAPCOA) thanks you for the opportunity to comment on CARB's Discussion Draft 2020 Mobile Source Strategy (MSS), dated April 23, 2021. We appreciate CARB staff's efforts in developing this strategy to help address the significant emissions produced by medium and heavy-duty vehicles operating in California. As you are aware, mobile sources are responsible for over 75% of state-wide oxides of nitrogen (NO_x) emissions and over 40% of state-wide greenhouse gas (GHG) emissions. Additionally, emissions from diesel exhaust are responsible for over 70% of the state's known airborne cancer risk. Significant and immediate emissions reductions from these sources will result in both immediate and long-term public health benefits, especially in disadvantaged communities that are already overburdened by the impacts of air pollution and climate change.

CAPCOA appreciates that the MSS includes many forward-looking measures that promise to significantly reduce emissions from medium and heavy-duty vehicles, and we recognize that it is being revised to include a glide path towards Governor Newsom's 2035 and 2045 zero emissions vehicle goals, as outlined in Executive Order N-79-20. However, we believe that the MSS is too focused on long term attainment deadlines and GHG targets and it does not sufficiently address the state's immediate air quality and climate needs. Senate Bill 44 (SB 44), which was signed into law in 2019 directs CARB to "... update the 2016 mobile source strategy to include a comprehensive strategy for the deployment of medium-duty and heavy-duty vehicles in the state for the purpose of bringing the state into compliance with federal ambient air quality standards and reducing motor vehicle greenhouse gas emissions from the medium-duty and heavy-duty vehicle sector."

Many areas of the state, namely the South Coast and San Joaquin Valley air basins need immediate, near-term emissions reductions to achieve federal ozone and PM2.5 standards by their respective deadlines. Also concerning is the fact that other areas of the state are either losing their attainment status or are being re-categorized to more severe non-attainment status. While emerging zero emission technology that could serve the medium and heavy-duty sector appears promising, it is still in the development phase for many types of vehicles and equipment. In the interim, the MSS should include strategies that rely on currently available near-zero emission technologies that will play a critical role in achieving the emissions reductions needed to meet California's near-term air quality needs. In addition, implementation of near-zero emission technologies now will yield significant, cumulative GHG reductions for years to come. We ask CARB staff to consider including measures that would provide much needed emissions reductions to quickly meet upcoming federal attainment deadlines, assist regions meet and maintain the state ozone standards, prevent further degradation of air quality in the state, and help mitigate the worst impacts of climate change.

Thank you again for the opportunity to comment on the draft 2020 MSS. We look forward to working with CARB staff in developing strategies that will help California meet its near and long-term air quality needs. Should you have any questions, please do not hesitate to contact me at (530) 274-9360, extension 502 or Tung Le, CAPCOA Executive Director at (916) 441-5700.

Sincerely,



Gretchen Bennett
President