

May 13, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

**COALITION FOR CLEAN AIR COMMENTS ON REVISED DRAFT: 2020 MOBILE
SOURCE STRATEGY**

Overall Comments.

With the vast majority of California's air pollution coming from transportation, the Mobile Source Strategy is a vital tool for planning measures that will deliver the emission reductions essential to allowing our residents to breathe healthy air. The revised draft includes a number of measures that we support because they will cut pollution that is damaging the health of Californians.

Unfortunately, the draft does not actually show numbers of emission reductions that add up to bringing the state into attainment by the deadlines set by the federal government pursuant to the Clean Air Act. Californians suffering from the worst smog and particle pollution in the country need relief now.

Shortfall in Incentive Funds.

CCA strongly supports the use of incentive funds to advance clean technologies and to hasten the replacement of dirty older engines with new cleaner technologies, and we actively advocate every year for the allocation of incentives to ARB and the air districts for these purposes. But we have cautioned in the past against over-relying on the prospect of future funding that is far from guaranteed, and our fears have been borne out by events.

There is a huge shortfall between the projected need and any realistic forecast of available funds. The largest source of incentive dollars in recent years, the Greenhouse Gas Reduction Fund, waxes and wanes with auction results. Most of the GGRF is continuously appropriated to other programs, and clean transportation has to compete for the scarce remaining dollars with several other worthy programs.

For these reasons, CARB should not count on incentives alone to make up the shortfall in emission reductions needed to reach attainment, and should plan for other measures to achieve the necessary emission reductions.

Fuels: Strengthen and Extend LCFS.

Executive Order N-79-20 (which we strongly support) says that CARB, "in consultation with other State agencies, shall develop and propose strategies to continue the State's current efforts to reduce the carbon intensity of fuels beyond 2030 with consideration of the full life cycle of carbon." The EO acknowledges that "California is already working to decarbonize the

transportation fuel sector through the Low Carbon Fuel Standard, which recognizes the full life cycle of carbon in transportation emissions including transport into the State," and that "clean renewable fuels play a role as California transitions to a decarbonized transportation sector."

Indeed, the LCFS has proven to be an effective tool in beginning the long transition of transportation fuels away from petroleum, and has successfully stimulated investments in cleaner alternatives like electricity, hydrogen, renewable diesel and biomethane. A stronger LCFS could do more to wean our transportation system away from its oil addiction and reduce the emissions from our trucks, cars and buses. Therefore, the Mobile Source Strategy should include a plan both to strengthen the LCFS' 2030 target and to extend the LCFS past 2030.

In addition, CARB should use specific regulatory measures to require the use of low-carbon renewable fuels where electrification is not available. For example, we support the proposal to require use of renewable diesel in commercial harbor craft running on diesel engines.

The Advanced Clean Cars Rule Should Tighten Criteria Emissions Standards and Ramp Up ZEV Requirements post 2025.

While we strongly support the transition to zero emission technologies as rapidly as is possible, we know that we must also strengthen controls on the combustion fleet and ensure real-world benefits of those stronger standards, and the Advanced Clean Cars rulemaking is the venue for those improvements. We support staff's proposals presented at the May 6 workshop on real-world emission reduction measures for combustion vehicles, cold-start emission reductions, improved emission control for plug-in hybrid vehicles, and new medium-duty requirements.

CARB should ramp up the ZEV standard quickly, beginning in 2026, so that by 2030 at least 70% of all new light-duty sales are zero-emission, on the way to 100% by no later than 2035.

Expand Car Scrappage.

The revised draft projects that "Retiring approximately 160,000 vehicles older than model year 2000 registered in the South Coast Air Basin by 2031 would yield emission reductions of approximately 3.1 tpd of tailpipe NOx and 0.3 MMT/yr of WTW GHG in the year 2031" but omits any plan for making that happen. Since it has been estimated that about 50 percent of the light-duty smog in California comes from only 10-15 percent of the vehicles, scrappage of these high emitters is an effective way to reduce pollution.

The Clean Cars 4 All project, funded by CARB and administered by several air districts, has already succeeded in scrapping thousands of older high emitting cars, with most participants replacing those clunkers with advanced clean cars. Expansion of CC4A should be included in the Strategy.

Reduce Vehicle Miles Travelled to Achieve Emission Reductions.

We strongly agree with the revised draft on the need to curb growth in vehicle miles travelled and reduce auto dependence. As the draft recognizes, the state is not on track to meet the GHG

emissions reductions expected under SB 375, because emissions from passenger vehicles are increasing as per capita VMT growth is outpacing technology gains. Many of the solutions to this problem are not available to CARB, but CARB should use SB 375 to bring about land use changes that reduce greenhouse gas emissions from personal transportation, as the law intended.

Expedite Heavy-Duty Inspection and Maintenance Rule.

SB 210 (Leyva, 2019) requires CARB to implement an inspection and maintenance program which will require that all heavy-duty vehicles operating in California have properly functioning emissions controls systems. CARB projects that 65% of the PM 2.5 from heavy-duty vehicles in 2031 will come from malfunctioning vehicles. The revised draft notes that the Board directed staff to accelerate the I&M program, and we appreciate staff's efforts to do that, although we are still disappointed with the slow pace of implementation. We urge the agencies involved to start the I&M program in 2022.

Retire Dirty Old Diesel Trucks.

While the Truck and Bus Rule will require retirement of virtually all pre-2010 diesel trucks, attaining the NOx reductions necessary to meet national clean air standards will require additional turnover. In fact, the revised draft states that “approximately 94,000 heavy-duty vehicles would need to be scrapped and replaced with zero-emission technologies.” But the document includes no plan for making that happen. At a minimum, CARB could establish that diesel trucks reaching the end of their useful lives are ineligible to operate in California. Requiring trucks older than 18 years of age or those with more than 800,000 miles and 13 years or older to turn over would yield NOx emissions reductions 33 tons per day in 2031 for 139,000 vehicles and 31 tpd in 2037 for 197,000 vehicles.

Accelerate Zero-Emission Transition for Small Off-Road Engines.

Given the combination of exhaust and evaporative emission impacts from this sector and growing awareness of failure rates coupled with the growing availability of zero emission options today, we urge CARB to adopt a rule this year requiring a transition to zero-emission equipment by 2024, a timeline that is technically feasible and brings significant benefits. Despite widespread adoption of zero emission technology at the household level, commercial users are slower to transition, making a forward-looking rule necessary.

Establish a Greenhouse Gas Standard for Ocean-Going Vessels.

CARB should add to its off-road strategy a focus on decreasing the carbon equivalent (“CO2e”) intensity of OGVs and increasing the range of low/zero-carbon and renewable OGV fuel alternatives in a timeline consistent with the International Paris Climate Agreement. CARB should require linear CO2e improvements per ship of at least 80% by 2030 based on ships’ 2008 baseline reported to the International Maritime Organization (“IMO”) or an equivalent California baseline.

According to the 2017 San Pedro Bay Ports Clean Air Action Plan, ships are the primary source of emissions at California ports. Fossil fueled OGVs are massive climate polluters that cause significant air pollution globally and acutely in port communities. OGVs emit large amounts of climate-warming carbon dioxide (“CO₂”), methane (“CH₄”), and black carbon. Fossil fueled OGVs produce nitrogen oxide (“NO_x”), sulfur oxides (“SO_x”), and particulate matter (“PM”) emissions, all of which cause grave health impacts.

CARB should also require vessel speed reduction, a proven strategy for reducing criteria pollutant emissions from OGVs.

Focus on Equity and Community Air Protection.

Air pollution and climate change do not affect all Californians equally – their adverse impacts fall disproportionately on low-income communities of color. For this reason, CARB should prioritize reducing pollution in those communities, through investments, enforcement and regulation. The Community Air Protection program established by AB 617 (C. Garcia, 2017) is supposed to provide relief to those communities facing the worst cumulative impacts from air pollution. The Community Emission Reduction Programs adopted so far have included many laudable elements but too few additional emission reductions. The Mobile Source Strategy should include measures that are targeted to reduce emissions in the most impacted communities.

Thank you for considering our views.

Respectfully Submitted,



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