

From: [Catalina Gonzalez](#)
To: [ARB Mobile Source Strategy](#)
Subject: 2025 Mobile Source Strategy
Date: Friday, November 22, 2024 5:22:05 PM

Dear CARB staff,

The Center for Progressive Reform is a non-profit research and advocacy organization that is guided by a national network of scholars and professional staff with expertise in governance and regulation. We conduct independent scholarly research and policy analysis focused on responding to our most pressing social challenges and centering justice in state and federal climate and energy policy. Our work is also informed by our research and reports that are part of our [CA Climate Justice Project](#).

We appreciate the opportunity to provide input on the development of the 2025 Mobile Source Strategy. In particular, we thank CARB staff for their work in using CA's authority under the Clean Air Act to set more stringent mobile source emission standards and assess emissions from the transportation sector comprehensively as part of this integrated planning process.

We are aware that this work is critical to accelerating the reduction of pollution and emissions from mobile sources, which is needed to meet federal air quality mandates and climate goals required under the State Strategy for State Implementation Plans, AB 32 Scoping Plan, and AB 617 Community Emissions Reduction Plans.

According to the Mobile Source Inventory, mobile sources and on-road passenger vehicles and heavy-duty trucks, in particular, account for the largest share of criteria pollutants, NoX, fine particulate matter, and GHGs. We strongly urge CARB to fully leverage its regulatory authority to achieve the maximum amount of emissions reductions to combat air pollution and climate change from these mobile sources.

We are generally supportive of CARB's approach to combining the use of manufacturing standards, end-user requirements, and voluntary incentive programs. We also encourage CARB to take additional steps in the next draft, including:

- Account for the projected increases in tons of NoX, PM2.5, and GHG emissions associated with the use of specific strategies and policy mechanisms identified
- Include strategies to address emissions from older heavy-duty diesel vehicles
- Account for and include strategies to reduce particulate matter and other toxins associated with the projected increase of VMT
- Clearly describe and show the impacts (benefits and risks) of specific strategies and policy mechanisms on disadvantaged communities to increase opportunities for the public and

impacted communities.

We look forward to continuing to engage in this process and also welcome the opportunity to participate in small group discussions with staff to provide further input and feedback.

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