November 22, 2024

California Air Resources Board
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Sacramento, CA 95814
Via email: MSS@arb.ca.gov

COMMENTS ON DISCUSSION DRAFT: 2025 MOBILE SOURCE STRATEGY

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 October 11 discussion draft includes a number of measures that we support because they will cut pollution that is damaging the health of Californians, but additional steps will be necessary to meet standards for smog, particulates, and greenhouse gasses.

We ask that the revised draft 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, and by the state for reducing greenhouse gas emissions. Californians suffering from the worst smog and particle pollution in the country, as well as catastrophic climate change, need relief sooner rather than later.

Shortfall in Incentive Funds.

Our groups strongly support 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. Ongoing state budget deficits have dried up most of CARB's General Fund dollars for incentive programs. 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.

Address Rise in Aviation Emissions.

Emissions from the aviation sector are projected to rise substantially. The Discussion Draft projects that 2050 emissions will be 74% higher for NOx, 12% higher for PM, and 61% higher for CO2, compared to 2020 levels. We urge CARB to set a timeline for adopting a Zero-Emission Ground Operations Regulation that includes zero-emission ground support equipment, a gate plug-in requirement and zero-emission taxiing. This measure will make airports healthier for workers, passengers and residents of nearby communities.

Retire Dirty Old Diesel Trucks.

Requiring the retirement of old heavy-duty diesel trucks is probably the single biggest step that CARB could take to reduce air pollution and improve lung health in California, especially in disadvantaged and low-income communities. Combustion engines and emission controls degrade as mileage and time accumulate, so older fossil fuel trucks almost always emit more per mile than younger ones. Before 2013, heavy duty trucks did not have on-board diagnostics (OBD), which means their emission controls are not as robust and excessively polluting trucks will not be identified as well by Clean Truck Check, which relies heavily on OBD.

The 2022 SIP included a Zero-Emission Truck measure to accelerate zero-emission truck adoption beyond existing measures, which will be necessary to attain the NOx reductions needed to meet national clean air standards. In fact, CARB at that time stated that "approximately 94,000 heavy-duty vehicles would need to be scrapped and replaced with zero-emission technologies." The 2025 MSS should spell out the measures that CARB will adopt to accomplish that turnover. 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, according to CARB estimates from 2021.

Reduce Emissions from Ocean-Going Vessels in State Waters.

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 ("CO_2"), methane ("CH_4"), and black carbon. Fossil fueled OGVs produce nitrogen oxide ("NOx"), sulfur oxides ("SOx"), and particulate matter ("PM") emissions, all of which cause grave health impacts.

CARB's 2022 State Strategy for the State Implementation Plan (SIP) emphasizes the need for action to reduce OGV emissions. CARB should adopt a rule requiring emission reductions from OGVs while in-transit, maneuvering and at anchor in Regulated California Waters. The rule should include cleaner fuels as well as vessel speed reduction, a proven strategy for reducing criteria pollutant emissions from OGVs.

Require Reductions in Tire Particle Emissions.

The discussion draft notes that "There are on-going efforts to reduce PM emissions from non-exhaust sources, including tire wear. These sources are becoming increasingly important as exhaust standards become more stringent." Indeed, the importance of non-exhaust sources is strongly suggested by the fact that PM emissions from medium and heavy-duty vehicles are projected to decrease only 4% from 2020 to 2050, compared to a 91% decrease in NOx.

We ask that CARB include in its plans a binding measure to require tire manufacturers to limit tire particle emissions from all on-road vehicles. CARB should coordinate with the Energy Commission, which plans to adopt efficiency standards for replacement tires.

Reduce Vehicle Miles Traveled to Achieve Emission Reductions.

We strongly agree with the discussion draft that "Vehicle miles traveled (VMT) reduction strategies are necessary to achieve climate and air quality mandates. VMT reduction efforts reduce emissions and advance public health, equity, and the economy." The state is not on track to meet the VMT reduction targets in the Scoping Plan. 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.

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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