

ATTACHMENT E to RESOLUTION 12-21
Findings and Statement of Overriding Considerations

Introduction

The *Environmental Analysis for the Advanced Clean Cars Program* (EA) in Appendix B to the Staff Reports (Initial Statement of Reasons) analyzed the potential environmental impacts associated with three proposed regulatory actions. The Advanced Clean Cars Program (ACC) is comprised of the Low-Emission Vehicle Criteria Pollutant and Greenhouse Gas (LEV III), Zero Emission Vehicle (ZEV), and Clean Fuels Outlet (CFO) regulations. The proposed California Evaporative Emission Regulations, Manufacturer Size Definition Changes, Environmental Performance Label (EPL), On-Board Diagnostic System Requirement for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles and Engines, and the E10 Certification Fuel are part of LEV III.

The EA was based on the expected compliance responses of the regulated communities covered by the ACC. The EA concluded that the compliance responses to the proposed ACC would result in beneficial impacts to air quality through reductions in emissions, including greenhouse gases (GHG), criteria air pollutants and precursors (CAP), and toxic air contaminants (TAC). It further concluded that the proposed ACC would result in less-than-significant impacts to agricultural and forest resources, land use, minerals, noise, population and housing, public services and recreation. The EA concluded there could be potentially significant adverse impacts to aesthetics, air quality (related to construction), biological resources, cultural resources, geology/soils, hazards (related to accidental releases), hydrology/water quality, traffic and utilities, largely due to construction activities related to the CFO regulation.

ARB's certified regulatory program requires that prior to adoption of an action for which significant adverse environmental impacts have been identified during the review process, that ARB consider all feasible mitigation measures and alternatives available which could substantially reduce such adverse impacts. (California Code of Regulations, tit. 17, section 60006.) CEQA places the burden on the approving agency to affirmatively show that it has considered feasible mitigation and/or alternatives that can lessen or avoid the impacts. A statement of findings for each identified significant impact is the means to show this consideration. (Public Resources Code section 21081.) CEQA Guidelines section 15091 provides direction on the content of the statement of findings. That section states that one or more of the following findings should be identified for each impact:

- Changes or alterations have been required in, or incorporated into, such projects which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes

have been adopted by such other agency, or can and should be adopted by such other agency.

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

Because all the adverse impacts identified in this programmatic level EA are potential indirect impacts associated with the compliance responses of covered entities, the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with local permitting authority, such as city or county governments and local air districts. ARB does not have the ability to determine with any specificity the project level impacts, nor the authority to require project-level mitigation in approving the ACC as discussed in the findings.

An agency may approve a project with unavoidable (unmitigated) adverse environmental impacts. When doing so, CEQA requires the agency to make a statement in the record of its views on the ultimate balancing of the merits of approving the project despite the environmental impacts in a “statement of overriding considerations.” (Public Resources Code section 21081(b); CEQA Guidelines 15093.) The following presents the Board’s statement of findings for each identified adverse impact, accompanied by a brief explanation, and its statement of overriding considerations.

Summary of Compliance Responses

As explained above, the EA analysis is based on the expected compliance responses of the regulated communities covered by the ACC program. A brief summary of the expected compliance responses is included again here to provide context.

For the LEV III regulation, the regulated community compliance responses consist of shifts in fleet mix, technology improvements, engine and emission controls systems improvements, improved transmission efficiency and air conditioning systems, use of lighter materials and low rolling resistance tires. Other compliance responses related to specific aspects of the LEV III rulemaking include the following responses. The California Evaporative Emissions Regulation compliance response by manufacturers would be testing. The Manufacturer Size Definitions would result in a shift from intermediate volume manufacturer to large volume manufacturer in 2018. Manufacturer compliance with the Federal Fuel Economy and Environment Label would be deemed compliant with the California Environmental Performance Label, so that one single label would display its Smog Score and Global Warming Score. The OBD II amendments consist of clarifications and relaxations, which include delays to the required start dates of a few OBD II monitoring requirements. Manufacturers would be expected to take advantage of the delays to improve their system strategies. The E10 Certification Fuel specification changes apply only to on-road vehicles not including on-road motorcycles.

The ZEV Regulatory amendments would require manufacturers to earn a minimum proportion of the required ZEV credits with actual ZEVs (i.e., battery electric vehicles [BEVs] or hydrogen fuel cell vehicles [FCV]). Credits can also be earned from Transitional Zero Emission Vehicles (TZEV) (i.e., plug-in hybrid electric vehicles). Compliance by manufacturers with the ZEV regulation as proposed for amendment would increase the number of ZEVs and TZEVs being sold and leased in California. The increase in BEVs and TZEVs (e.g. PHEVs) produced by manufacturers to meet requirements of the amended ZEV regulation would be accompanied by an increase in the production of propulsion batteries or use of lithium-ion batteries in BEV and TZEV models instead of nickel-metal hydride batteries. Currently, PHEV and BEV propulsion batteries are replaced at authorized original equipment manufacturer (OEM) service centers. Vehicle manufacturers differ in how they are handling, recycling or disposing of propulsion batteries after they reach the end of their useful life in the PHEVs and BEVs they power. Manufacturers and fuel providers would ensure infrastructure to support ZEVs. The increase in FCVs produced by manufacturers to meet requirements of the amended ZEV regulation would be accompanied by an increase in the production of hydrogen fuel cells, and a method to address fuel cell disposal, recycling and exchange. Under the Clean Fuels Outlet (CFO) Regulation, requirements for new hydrogen fuel outlets would be activated at trigger points. Major producers/importers of gasoline would be required to meet infrastructure requirements of ZEVs via construction of hydrogen fueling stations.

Statement of Findings

The Board has considered the entire record, including the information contained in the EA, public testimony, written comments received, and the written responses to comments. Based on this information, the Board makes the following written findings for each significant adverse impact identified, accompanied by a brief explanation of the rationale for each finding. These findings are supported by substantial evidence in the record.

Aesthetics

Finding and Explanation:

The EA concluded that the compliance could result in the construction and operation of new manufacturing plants that specialize in the production of propulsion batteries and fuel cells. New hydrogen fueling stations could also be constructed and operated along with modifications to existing hydrogen production plants. The EA concluded that construction and operation of these, though likely to occur in areas with consistent zoning, could introduce or increase the presence of artificial elements (e.g., heavy-duty equipment, removal of existing vegetation, buildings) in areas with national, state, or county designated scenic vistas and/or scenic resources visible from state scenic highways. In addition, operation may introduce substantial sources of nighttime lighting for safety and security purposes.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Air Quality

Finding and Explanation:

The EA concluded that the compliance responses would result in reductions in criteria pollutants and greenhouse gases, except for the potential for short-term construction-related impacts related to providing clean fuels facilities (e.g., use of heavy-duty construction equipment) which may result in a temporary and intermittent increase in CAPs and TACs.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Biological Resources

Finding and Explanation:

The EA concluded that the compliance responses could result in the construction and operation of new manufacturing plants that specialize in the production of propulsion batteries and fuel cells. New hydrogen fueling stations could also be constructed and operated along with modifications to existing hydrogen production plants. The EA found these would likely occur within existing station footprints or in areas with consistent zoning; however, there is uncertainty as to the exact locations of these new facilities in relation to the location of biological resources.

Therefore, the EA concluded that both the construction and the long-term operation of these facilities could affect biological resources.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Cultural Resources

Finding and Explanation:

The covered entity compliance responses could result in the construction and operation of new manufacturing plants that specialize in the production of propulsion batteries and fuel cells. New hydrogen fueling stations could also be constructed and operated along with modifications to existing hydrogen production plants. The EA concluded these would likely occur within existing station footprints or in areas with consistent zoning, but there is uncertainty as to the exact locations of these new facilities in relation to the location of cultural resources. Therefore, the EA found that the construction of new plants could require disturbance of undeveloped area or demolition of existing structures which could affect cultural resources.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further, the EA's programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Geology, Soils, and Mineral Resources

Finding and Explanation:

The covered entity compliance responses could result in the construction and operation of new manufacturing plants that specialize in the production of propulsion batteries and

fuel cells. New hydrogen fueling stations could also be constructed and operated along with modifications to existing hydrogen production plants.

The EA concluded that development of facilities are potentially susceptible to the presence of expansive soils particularly in areas of fine-grained sediment accumulation typically associated with playas, valley bottoms, and local low-lying areas. The specific design details, siting locations, seismic hazards, and geologic, slope, and soil conditions for a particular manufacturing plant or hydrogen fueling station are not known at this time and would be analyzed on a site-specific basis at the project level. Therefore, the EA disclosed that development of these facilities could expose people and structures to relatively high levels of risk associated with strong seismic ground shaking

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Hazards

Finding and Explanation:

The EA concluded that the compliance responses would result in less than significant impacts associated with hazard and hazardous materials, except for the potential for significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment from transfer of fuel during construction activities using heavy-duty equipment.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Hydrology and Water Quality

Finding and Explanation:

The EA concluded that the compliance responses would result in less than significant impacts to hydrology and water quality, except with regard to potential for altering drainage patterns, flooding, and inundation by seiche, tsunami, or mudflow from construction and operation of new manufacturing plants that specialize in the production of propulsion batteries and fuel cells. These new facilities would likely occur within existing footprints or in areas with consistent zoning; however, the specific design details, siting locations, and associated hydrology and water quality issues are not known at this time and would be analyzed on a site-specific basis at the project level.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Noise

Finding and Explanation:

The EA concluded that the compliance responses would result in less than significant impacts to noise, except for potentially significant increases in ambient noise as a result of construction-related activities.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further, the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Transportation and Traffic

Finding and Explanation

The EA concluded that the compliance responses would result in less than significant impacts to transportation and traffic, except for potential effects of short-term construction traffic (primarily motorized) from worker commute and material delivery related trips traffic associated with new plants, stations and modifications.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further, the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Utilities

Finding and Explanation

The EA concluded that the compliance responses that involve construction new hydrogen fueling stations would not affect the demand for water supply, wastewater treatment, and storm water, and solid waste infrastructure would not be expected to exceed the capacity of the local providers or necessitate an increase in service capacities and associated infrastructure. The EA concluded, however, that new facilities could generate substantial increases in the demand for water supply, wastewater treatment, storm water drainage, and solid waste services in their local areas.

The EA identified recognized measures that exist to reduce this potentially significant impact; but the authority to determine project-level impacts and require project-level mitigation lies with the permitting agency for individual projects. This impact could be reduced to a less-than-significant level by mitigation that can and should be implemented by local lead agencies, but is beyond the authority of ARB. Further, the EA programmatic analysis does not allow project-specific details of mitigation, resulting in an inherent uncertainty in the degree of mitigation ultimately implemented to reduce the potentially significant impacts. Consequently, the Board takes a conservative approach in its post-mitigation significance conclusion and finds this impact potentially significant and unavoidable.

Findings on Alternatives to the Project

In addition to the No-Project Alternative, the EA considered a reasonable range of action alternatives potentially capable of reducing the proposed ACC's environmental effects while accomplishing most of the project objectives. Those project objectives are detailed at pages 22-23 of the EA, and include:

- Ensure all Californians can live, work, and play in a healthful environment free from harmful exposure to air pollution;
- Achieve the maximum emissions reduction possible from motor vehicles;
- Establish a uniform set of vehicle emission standards;
- Reduce dependence on petroleum as an energy resource;
- Decrease GHG emissions in support of statewide GHG reduction goals;
- Ensure emission reduction;
- Improve automotive technologies and fueling infrastructure; and
- Spur economic activity.

The Board finds the alternatives analysis is sufficient to inform the Board and the public regarding the tradeoffs between the degree to which the alternatives could reduce environmental impacts and the corresponding degree to which the alternatives could achieve the project objectives.

Based upon a full evaluation of the alternatives, the Board finds that adoption and implementation of the Advanced Clean Cars Program regulations is the most desirable, feasible, and appropriate action for achieving the objectives of the project, and the Board rejects the other alternatives as either less desirable or infeasible based on consideration of the relevant factors identified in the EA and briefly described below:

1. No Project Alternative

The EA analyzed a No Project Alternative in which amendments would not occur to the existing LEV (including EPL), ZEV, and CFO regulations. The No Project Alternative would fail to achieve the CAP and GHG reductions necessary to achieve air quality standards and GHG requirements and targets. The No Project Alternative would not fulfill the requirement of HSC Section 43018(a), which requires ARB to reduce vehicle emissions of CAPs to the maximum extent feasible and not help attain the California and national ambient air quality standards. The No Project Alternative would also fail to fulfill either the AB 1493 mandate to achieve maximum feasible GHG reductions or the

AB 32 mandate to reduce GHG emissions to 1990 levels by 2020. In addition, implementation of the No Project Alternative would prevent ARB from coordinating with standards currently being developed by U.S. EPA and NHTSA. Under this alternative, the existing CFO regulation would not require hydrogen fueling infrastructure sufficient to support the FCV market. In addition, the EPL would not be changed to be consistent with the federal Fuel Economy and Environment label which could result in buyer confusion.

The No Project Alternative is not expected to result in any new environmental impacts because compliance responses by vehicle manufacturers and refiners and importers of gasoline would be the same as under the existing regulatory environment. However, the beneficial impacts resulting from the proposed ACC from the reduction of CAPs and GHG and the expected reduction in dependence on conventional petroleum fuels would also not occur. Therefore, this alternative does not create an environmentally advantageous outcome. It also fails to meet basic project objectives indicated above, because the enhancements to programs for CAP and GHG reductions necessary to achieve air quality standards and GHG requirements and targets would not occur. The No Project Alternative would not help attain the California and national ambient air quality standards and it would fail to ensure all Californians to live, work, and play in a healthful environment free from harmful exposure to air pollution. For these reasons, the Board rejects this alternative.

2. More Stringent Emissions Standards in the Low-Emission-Vehicle and Zero Emission Vehicle Regulations

The EA analyzed a 'More Stringent Alternative.' The EA concluded that potential adverse environmental impacts under this alternative would be similar to the proposed ACC Program. However, although beneficial air quality, GHG, and energy effects would be anticipated to be greater overall, these benefits could occur at a slower pace. The potential benefits of greater emissions reductions under this alternative is likely to be offset by slower vehicle turnover, and therefore, it is less likely that a reduction in vehicle CAP emissions would occur to the maximum extent feasible as required by HSC Section 43018(a). For the same reasons, it is less likely that this alternative would achieve the reduction of GHGs identified for this program in the Scoping Plan. Manufacturers have indicated that a more stringent set of standards within this timeframe would be prohibitively expensive because time is needed to design the necessary innovations and establish production lines. Additionally, this alternative is expected to cause a greater incremental increase in cost borne by consumers than under the ACC Program. Therefore, this alternative has a lower ability than the ACC Program to meet the basic project objectives and it does not create an environmentally advantageous outcome. For the forgoing reasons, the Board rejects the 'More Stringent Alternative.'

3. Less Stringent Emissions Standards in the Low-Emission-Vehicle and Zero Emission Vehicle Regulations

The EA analyzed a ‘Less Stringent Alternative.’ The emissions reduction expected to be achieved under this alternative would not be as great as the reductions that would be expected under the proposed ACC Program. The emissions reduction would not be the maximum feasible reduction that is mandated by HSC Section 43018(a). This alternative would limit the ability of various air districts throughout the State to attain the State and national ambient air quality standards in their respective air basins.

Similarly, the extent of the reductions of GHG would be less than the amount identified for the ACC Program in the Scoping Plan and may compromise achieving the AB 32 target. This alternative would also not meet the maximum feasible emission reductions in furtherance of AB 1493. This alternative would not benefit the state to the extent of the ACC Program in terms of creating a more fuel efficient fleet less dependent on petroleum. Therefore, this alternative has a lower ability than the proposed amendments to meet the primary project objectives.

The adverse environmental impacts associated with this alternative would be similar to the ACC Program, although impacts may be less or occur later in time. However, the beneficial air quality, GHG, and energy effects would be anticipated to be less than those that would occur with under the ACC program. Therefore, this alternative does not create an environmentally advantageous outcome. For the forgoing reasons, the Board rejects the ‘Less Stringent Alternative.’

4. A Clean Fuels Outlet Regulation Based on a Memorandum of Agreement with Major Refiners and Importers of Gasoline

The EA analyzed a ‘Memorandum of Agreement (MOA) Alternative.’

Under this alternative there may not be a sufficient availability of hydrogen fuel for hydrogen fuel vehicles produced and sold by automobile manufacturers to fulfill the requirements of the ZEV regulation. This could ultimately affect California’s ability to achieve the maximum emissions reduction possible from motor vehicles as required by HSC Section 43018(a) and to help local air basins attain the California and national ambient air quality standards. This alternative could also hinder California’s ability to achieve the reductions of GHGs identified for the ACC Program in the Scoping Plan and compromise the ability to meet the AB 32 target. This alternative would also not meet the maximum feasible emission reductions in furtherance of AB 1493.. If successful, it would create a multiparty agreement and funding mechanism for establishing new hydrogen fueling stations. Successful implementation of hydrogen infrastructure would be contingent upon securing funding and appropriate levels of commitment from the parties to the agreement. Each party to the agreement may interject its own unique stipulations. Since it is not clear whether a party to the MOA may face penalties if it failed to fulfill the MOA, construction of fewer fueling stations may result. There could be an insufficient availability of hydrogen fueling stations essential to fuel cell vehicle commercialization, adversely affecting the objective of reducing California’s dependence on petroleum. This uncertainty could ultimately affect California’s ability to

achieve the maximum emission reductions possible from motor vehicles as required by HSC section 4301(a) and to help local air basins attain the California and national ambient air quality standards. Because of the uncertainties of whether this alternative would decrease GHG emissions in support of statewide GHG reduction goals, ensure emission reduction or improve automotive technologies and fueling infrastructure, this alternative, this alternative has a lower ability to meet the primary project objectives than the proposed amendments.

Even if the MOA alternative was fully reliable and effective, the potential benefits to air quality, GHG, and energy are anticipated to be similar to those that would occur with implementation of the proposed ACC program. However, this alternative does not substantially reduce the potentially adverse environmental impacts because it has the potential for adverse impacts similar as the ACC Program. For the foregoing reasons, the Board rejects this alternative.

STATEMENT OF OVERRIDING CONSIDERATIONS

Although significant adverse impacts identified in the EA would be expected to be avoided or mitigated, because some uncertainty exists as to the extent of mitigation at the project level, the Board is conservatively considering the impacts to be significant and unavoidable. The Board finds that, despite the potential for adverse environmental impacts associated with the proposed Advanced Clean Cars Program, other benefits of this action, which will flow to all residents of the State, are determined to be overriding considerations that warrant approval of the Project and outweigh and override its unavoidable significant effects. These benefits include:

1. A reduction in greenhouse gas emissions, thereby benefitting the environment and current and future generations;
2. Related statewide health benefits from the reduction of other co-pollutants by complementing and support California's existing efforts to reduce criteria and toxic air pollutants;
3. Providing a program that complements other Scoping Plan measures, such as standards for low-carbon fuels, renewable electricity and energy efficiency; and
4. Providing for the developments of environmentally superior cars that will continue to deliver the performance, utility, and safety, while saving consumers money by combining the control of criteria and greenhouse gas emissions into a single coordinated package of requirements;
5. Helping meet California's air quality goals by achieving ozone attainment, and reducing criteria emissions to attain mandated federal and state ambient air quality standards;
6. Achieving climate change goals set forth in AB 1493 (Pavley legislation) and AB 32;
7. Helping to reduce continued reliance on fossil fuels; Fostering innovative technologies for the future;
8. Improving health of all Californians; and
9. Reducing risk of climate change impacts.