

**Comment 1 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Sakereh

Last Name: Carter

Email Address: sakereh.carter@sierraclub.org

Affiliation:

Subject: Sierra Club California Comment on the 2022 State SIP Strategy

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-statesip22-UyABbIE1WHkGclQ1.pdf'

Original File Name: Sierra Club CA CARB SIP Written Comment .pdf

Date and Time Comment Was Submitted: 2022-08-24 09:17:23

No Duplicates.

## **Comment 2 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Thomas

Last Name: Becker

Email Address: tbeckerpower@gmail.com

Affiliation: T Becker Power Systems

Subject: Alternatives to all CAA 209(b) strategies found in SIP

Comment:

This is a corrected version of a comment submitted earlier.

1- The SIP contains several strategies for reducing ground level ozone and other pollutants.

2- The SIP contains strategies, standards and regulations that have or will require a CAA 209(b) waiver from US EPA.

3- Two of those strategies that require EPA waivers are the ACC and ACC II regulations.

4- The emission reductions the state is achieving or wishes to achieve from the entire CAA 209(b) program, which includes the ACC and ACC II regulations, can be achieved without the CAA 209(b) program by replacing all current CAA 209(b) standards with applicable EPA standards, not implementing any new CAA 209(b) standards and reducing statewide VMT 30% from a 2019 baseline by 2030 and 55% by 2040. In other words, the entire CAA 209(b) program is no longer needed.

5- As part of the state's SIP review/update, I am submitting an alternative to the entire CAA 209(b) waiver program. I request CARB staff prepare an analysis comparing the emission reductions achievable from all current and proposed CAA 209(b) strategies to the alternative found in in comment #4. This request is made pursuant to CEQA requirements, as well as EPA requirements under CAA 209(b)(1).

Thank you  
Tom Becker

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-08-26 17:16:11

No Duplicates.

### **Comment 3 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Jane

Last Name: Sellen

Email Address: jane@pesticide-reform.org

Affiliation: Californians for Pesticide Reform

Subject: SIP Strategy must include SIP-enforceable pesticide emission reduction targets

Comment:

Greetings,

A comment letter from the Californians for Pesticide Reform (CPR) coalition and 51 co-signatories is attached.

We call on CARB to: 1) Proactively assert its authority to regulate smog-forming emissions from use of pesticides classified as TACs, and 2) Include in the SIP meaningful and enforceable measures to reduce use of pesticides that contribute to VOC emissions. Specifically, we urge CARB to include a commitment to reduce pesticide VOC emissions by 30% by 2030 and by 75% by 2037 from 2020 levels in high pesticide use non-attainment air basins, with a focus on mandatory targets for reduced usage and adoption of agroecological practices.

At a minimum, if CARB proceeds with the inclusion of the 1,3-D regulation as a measure in the SIP, we ask that CARB exercise their admitted authority to regulate 1,3-D air emissions by setting a SIP-enforceable 1,3-D emissions reduction target.

Sincerely,

Jane Sellen and Angel Garcia, CPR Co-Directors

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-statesip22-AmRRPgBvVWcLYQVa.pdf>'

Original File Name: FINAL 2022 SIP comments sign on letter September 2022.pdf

Date and Time Comment Was Submitted: 2022-09-09 09:18:58

No Duplicates.

## **Comment 4 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Michael

Last Name: Kapolnek

Email Address: mike.kapolnek@att.net

Affiliation:

Subject: Proposed Measures: Residential and Commercial Buildings

Comment:

The proposal for zero emission space and water heaters places an unfair burden on those building owners whose electric service panel cannot support these appliances. A panel upgrade is a complicated retrofit requiring design and coordination with the utility. The staff report acknowledges that some buildings will require upgrades but does not provide any background on its scope. It is unreasonable to expect building occupants to go without space or water heating for the time it takes to complete the upgrade. My wife and I are currently upgrading our panel from 100A to 200A. Ours is a simple job which will not require moving the panel. We are three weeks into the process with at least another week before it can be completed. Our next-door neighbors waited over a year, in part because PG&E needed to upgrade the neighborhood electric lines.

For many, a panel upgrade is complicated by relatively recent PG&E guidelines requiring separation of the panel and gas meter. The electric panel of many of our neighborhood homes is directly above the gas meter and cannot be upgraded in that location. Moving a panel adds considerable complexity, cost and lead time. Also, PG&E charges thousands of dollars if a new service drop from the overhead lines is required. For those building owners, failure of a gas space or water heater would be an unmitigated disaster.

If the rule's intent is to scare building owners into a preemptive panel upgrade, the board should consider whether those upgrades could be completed before 2030. Some report references indicate that no reliable data is available on the number of buildings that would require retrofit. One reference estimates one to two million. Twelve thousand upgrades per month over seven years would be required to complete one million upgrades. I doubt the state's utilities or contractor base could support that. It also seems obvious that a large fraction of homes requiring a panel upgrade will be in disadvantaged neighborhoods since those residents would not have had the resources to already upgrade their homes.

I urge the board to delete this item from the SIP and replace it with a building code change that requires zero emission water and space heaters only for homes whose panels can support those appliances. The board could then recommend state programs to encourage preemptive panel upgrades.

Climate change due to fossil fuel emissions is obviously a major problem and we must address emissions as soon as possible, but the 2030 zero emission space and water heater rule is too drastic given the impact on those without adequate electric service and that the total building contribution to NOx emission is only 5%. Please

modify this rule as I suggest.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-11 08:25:42

No Duplicates.

**Comment 5 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Aeron

Last Name: Arlin Genet

Email Address: aag@sbcapcd.org

Affiliation:

Subject: Santa Barbara County Air Pollution Control District Letter

Comment:

Please refer the attached comment letter from the Santa Barbara County Air Pollution Control District. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-statesip22-BTcANIRnUDEBKgQ9.pdf'

Original File Name: 2022-9-12 Final Ltr to CARB - 2022 State SIP Strategy.pdf

Date and Time Comment Was Submitted: 2022-09-12 10:47:29

No Duplicates.

**Comment 6 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Frank  
Last Name: Wolak  
Email Address: fwolak@fchea.org  
Affiliation:

Subject: FCHEA Comment Regarding Proposed 2022 State Strategy for the State Implementation Plan  
Comment:

Please refer to the attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-statesip22-BmBdOAduUWcKbQVa.pdf'

Original File Name: FCHEA Comment on CARB Proposed 2022 State Strategy for the State Implementation Plan.pdf

Date and Time Comment Was Submitted: 2022-09-12 11:21:09

No Duplicates.

**Comment 7 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Theresa

Last Name: Romanosky

Email Address: tromanosky@aar.org

Affiliation:

Subject: AAR's Comments on CARB's SIP Strategy

Comment:

Please see attached cover letter and comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-statesip22-AmhkGYcJAHhVJM0d.pdf'

Original File Name: AAR SIP Strategy Submission.pdf

Date and Time Comment Was Submitted: 2022-09-12 15:05:59

No Duplicates.

## **Comment 8 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Leah

Last Name: Louis-Prescott

Email Address: llouisprescott@rmi.org

Affiliation: RMI

Subject: Support for zero emission appliance standards

Comment:

RMI, Sierra Club, Emerald Cities Collaborative, SPUR, Natural Resources Defense Council, and Earthjustice support the zero emission standard for new space and water heaters, and offer the following recommendations:

1. The proposed zero-emission appliance measure should be adopted as a key measure to achieve the state's health, air quality, and decarbonization goals, and to advance environmental justice.
2. A rulemaking to develop the proposed standards, as well as the pursuit of equity-promoting policies, should begin immediately, in partnership with community representatives, to ensure equitable rule implementation by 2030.
3. The zero-emission standards should cover all building end uses to maximize benefits.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-statesip22-USNVPlw0BHODdgRt.pdf>'

Original File Name: RMI-Sierra Club-ECC-SPUR-NRDC-Earthjustice\_SIP

Comments\_09.12.2022.pdf

Date and Time Comment Was Submitted: 2022-09-12 15:37:31

No Duplicates.

## **Comment 9 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Coalition for Clean Air Comments on the Proposed 2022 State Strategy for the State Impleme

Comment:

September 12, 2022

California Air Resources Board  
Byron Sher Auditorium  
1001 I Street  
Sacramento, California 95814

Coalition for Clean Air Comments on the  
Proposed 2022 State Strategy for the State Implementation  
Plan

California is home to the most polluted air in the United States. Air pollution causes a wide range of health impacts, including asthma attacks, heart attacks, strokes, lung cancer and thousands of premature deaths annually in California. Pollution threatens the health of all Californians, but especially those in our most disadvantaged communities and communities near ports, railyards, warehouses and other major trucking routes.

The 2022 State Strategy for the State Implementation Plan (SSSIP) needs to provide a map toward delivering healthy air to all Californians. We appreciate all the hard work that went into the proposal and look forward to collaborating with CARB on implementing many of the measures. At the same time, we think it important to point out that the proposal is unlikely to bring the South Coast and San Joaquin Valley regions into attainment with national ambient air quality standards.

Achieving clean air will require concerted action by CARB, the federal government and the air districts. We strongly agree with the statement that "For California to meet air quality standards, it is imperative that the federal government act decisively to reduce emissions from primarily-federally regulated sources of air pollution, including interstate trucks, ships, locomotives, aircraft, and certain categories of off-road equipment." Unfortunately, we can not say with confidence that the federal government will in fact fulfill its duty to take those actions.

Zero Emissions Trucks  
Measure

Heavy-duty trucks are responsible for over

half of smog- and particle forming emissions despite representing only three percent of the vehicles on California roads. Diesel exhaust is a toxic air contaminant containing dozens of carcinogens and is often concentrated in low-income communities and communities of color. Recent CARB estimates indicate that nearly 145,000 trucks would be considered gross polluters under the planned Heavy-Duty Inspection and Maintenance program as vehicles age and emission controls deteriorate over time.

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. Adopting such a measure would require no additional statutory authority; only willingness by the Board to take this life-saving step. Therefore, we appreciate the inclusion of the Zero Emissions Trucks Measure in the SSSIP, in response to suggestions from the public, and we recommend some improvements to maximize its effectiveness.

How

Does State Law Define "Useful Life"?

Section 43021 of the Health and Safety Code, enacted by SB 1 in 2017, intends to provide "certainty about the useful life of engines." The provision prohibits CARB from requiring the retirement, replacement, retrofit, or repower of heavy-duty trucks until they have reached at least 13 years of age and then reach either 800,000 miles or 18 years, whichever comes first. This definition of useful life was de facto sponsored by the California Trucking Association. However, nothing currently requires heavy-duty trucks to be removed from operation at the end of their useful life.

What are the benefits of retiring old trucks?

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 CARB's proposed Inspection and Maintenance rule, which will rely heavily on OBD; All new trucks sold from 2024 onward will have to meet stronger NOx standards from the Heavy-Duty Omnibus (HDO) rule. Mandated retirement will shrink the overall pool of pre-2024 diesel vehicles; and Mandating retirement will provide more opportunities for the deployment of cleaner technologies and enable better planning by providing more certainty on truck turnover. For instance, the upcoming Advanced Clean Fleets rule would drive an increasing number of purchases of zero emission (ZE) trucks. New entrants to the Drayage Truck Registry would have to be ZE from 2024 on.

The Timetable for the Zero Emissions Trucks Measure Should be Accelerated  
The measure in the proposal would

potentially come before the Board in 2028, go into effect in 2030, and could follow one of two pathways. Given the urgency of our air pollution crisis, the Board should take action sooner, because all of the 2010 trucks will have reached the end of their useful lives by 2028.

Therefore, we recommend that CARB decide by the end of 2024 which option it will pursue, with the Board acting no later than 2026 so that the rule can be implemented by 2028. The statewide NOx reductions of 14.3 tons per day make this measure one of the most significant in the SSSIP, and we cannot afford to delay or equivocate in implementing the measure.

Respectfully Submitted,

Bill Magavern  
Policy Director  
Coalition for Clean Air

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-statesip22-VTYHYlAwVFhWMwZp.docx>'

Original File Name: CCA comments on Proposed SIP Strategy 9.12.22.docx

Date and Time Comment Was Submitted: 2022-09-12 17:10:55

No Duplicates.

**Comment 10 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Jessi

Last Name: Davis

Email Address: jdavis6@socalgas.com

Affiliation: SoCalGas

Subject: SoCalGas Comments on Proposed 2022 State SIP Strategy

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-statesip22-BXZUPVMxADIFbwVi.pdf'

Original File Name: SoCalGas Comments on Proposed 2022 State SIP Strategy.pdf

Date and Time Comment Was Submitted: 2022-09-12 16:25:34

No Duplicates.

**Comment 11 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Ignacio

Last Name: Fernandez

Email Address: ignacio.m.fernandez@sce.com

Affiliation: Southern California Edison

Subject: SCE comments on Proposed State SIP Strategy

Comment:

Dear Sir/Madam,

Please find attached a document

with Southern California Edison's comments on the Proposed 2022 State Strategy for the State Implementation Plan that was released on August 11, 2022.

Best regards,

Ignacio Fernandez  
Southern California Edison

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-statesip22-UyBdOFYyA2IFMwEz.pdf'

Original File Name: SCE20220912SIP.pdf

Date and Time Comment Was Submitted: 2022-09-12 17:51:40

No Duplicates.

**Comment 12 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Laurel

Last Name: Moorhead

Email Address: lmoorhead@transferflow.com

Affiliation: Transfer Flow, Inc.

Subject: Transfer Flow, Inc.'s public comment regarding CARB's 2022 SIP

Comment:

Please find attached Transfer Flow, Inc.'s public comment regarding CARB's State Implementation Plan.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-statesip22-V2VXYVdkBWQBKgAw.pdf'

Original File Name: 2022-09-12 SIP Public Comment.pdf

Date and Time Comment Was Submitted: 2022-09-12 18:52:30

No Duplicates.

**Comment 13 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Christine

Last Name: Wolfe

Email Address: christinew@cceb.org

Affiliation: CCEEB

Subject: CCEEB Comments on the Proposed 2022 State SIP Strategy

Comment:

Please see the attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-statesip22-W2lcalFiVjcKIIRk.pdf'

Original File Name: 2022.09.12 CCEEB Comments Proposed 2022 State SIP Strategy.pdf

Date and Time Comment Was Submitted: 2022-09-12 20:37:55

No Duplicates.

**Comment 14 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation: California Natural Gas Vehicle Coalition

Subject: CNGVC Comments on Proposed 2022 State SIP Strategy

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-statesip22-VTYHbwFnWH0AZQBf.pdf'

Original File Name: CNGVC Comment Letter on Proposed 2022 State SIP Strategy FINAL 091222.pdf

Date and Time Comment Was Submitted: 2022-09-12 20:39:18

No Duplicates.

**Comment 15 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Aymeric

Last Name: LIBEAU

Email Address: alibeau@transition-one.fr

Affiliation:

Subject: ZEV industrial retrofit as a viable alternative to new and used ZEVs

Comment:

Here is a proposal to quickly and massively reduce GHG emissions from existing cars with industrial retrofit approach on recent vehicles.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-statesip22-USUBNlwCVnYEdgZn.pdf'

Original File Name: T1\_StatPos\_IndustrialRetrofit\_CA.pdf

Date and Time Comment Was Submitted: 2022-09-12 22:24:53

No Duplicates.

## **Comment 16 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Aymeric

Last Name: LIBEAU

Email Address: alibeu@transition-one.fr

Affiliation:

Subject: ZEV industrial retrofit as a viable alternative to new and used ZEVs

Comment:

We would appreciate that the ZEV industrial retrofit would be recognized as a viable alternative to new and used ZEVs for the light-duty vehicle category, and that it would be shown as such in your implementation plan.

It would be desirable if a recognition would translate into funds being available for this industry and also into ZEV retrofits being granted similar rebates as those for new and used ZEV purchases.

Furthermore, your support and push for a regulatory framework guiding this industry at both State and Federal levels would also be welcomed.

Please see attached document for further details.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-statesip22-B3NSZVwCUHACcAdm.pdf'

Original File Name: T1\_StatPos\_IndustrialRetrofit\_CA\_final.pdf

Date and Time Comment Was Submitted: 2022-09-12 22:49:47

No Duplicates.

**Comment 17 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Adrian

Last Name: Martinez

Email Address: [amartinez@earthjustice.org](mailto:amartinez@earthjustice.org)

Affiliation: Earthjustice

Subject: State Strategy Comment

Comment:

Please find the attached comments on the State Strategy. We appreciate the SIP staff's diligent work on this air plan, and we look forward to working together to meet clean air standards.

All the best,

Adrian

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-statesip22-USUBaFFnWHcKIm0d.pdf>'

Original File Name: State Strategy Comments 9-12-2022 Final.pdf

Date and Time Comment Was Submitted: 2022-09-12 23:32:03

No Duplicates.

**Comment 18 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22) - Non-Reg.**

First Name: Jennifer

Last Name: Leech

Email Address: JLeech@bdlaw.com

Affiliation:

Subject: A4A Comments on CARB Proposed 2022 State Strategy for the State Implementation Plan

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-statesip22-VGYANgEyUjNWfVVI.pdf'

Original File Name: 2022-09-22 A4A Comments on CARB Proposed 2022 State SIP Strategy.PDF

Date and Time Comment Was Submitted: 2022-09-22 08:44:43

No Duplicates.

**Comment 1 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22). (At Hearing)**

First Name: Will

Last Name: Barrett

Email Address: William.Barrett@lung.org

Affiliation: American Lung Association

Subject: Comment Submission: Item 22-12-3

Comment:

<p>Please see the comment attached.&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-statesip22-ViUBc1Y2WX4LaABf.pdf>

Original File Name: State Implementation Plan Letter\_9.21.22.pdf

Date and Time Comment Was Submitted: 2022-09-22 09:29:42

No Duplicates.

**Comment 2 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22). (At Hearing)**

First Name: Teresa

Last Name: Bui

Email Address: tbui@pacificenvironment.org

Affiliation: Pacific Environment

Subject: Environmental groups joint comment letter on 2022 SIP Strategy

Comment:

<p>Please see the coalition letter attached. Thank you for your consideration.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-statesip22-VjUGYQd0BzYHXlAg.pdf>

Original File Name: CARB Proposed SIP Coalition Comments September 2022.pdf

Date and Time Comment Was Submitted: 2022-09-22 09:45:05

No Duplicates.

### **Comment 3 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22). (At Hearing)**

First Name: Wayne

Last Name: Nastri

Email Address: wnastri@aqmd.gov

Affiliation: AQMD

Subject: South Coast AQMD Comments on CARB Proposed SIP Strategy

Comment:

<p><span style="font-size: 12.0pt; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">Please see the attached comments on CARB's Proposed SIP Strategy.</span></p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-statesip22-VjUAaVc7AD4KaVA+.pdf>

Original File Name: Comments on CARB Proposed SIP Strategy\_v2 09-13-2022.pdf

Date and Time Comment Was Submitted: 2022-09-22 13:57:34

No Duplicates.

**Comment 4 for Proposed 2022 State Strategy for the State Implementation Plan (statesip22). (At Hearing)**

First Name: Adrian

Last Name: Martinez

Email Address: [amartinez@earthjustice.org](mailto:amartinez@earthjustice.org)

Affiliation: Earthjustice

Subject: Comments on State Strategy

Comment:

<p>Please see the attached comment.&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-statesip22-B3RcLlMzUXZRMIUK.pdf>

Original File Name: State Strategy Comments 9-12-2022 Final.pdf

Date and Time Comment Was Submitted: 2022-09-22 14:39:46

No Duplicates.