



October 18, 2021

California Air Resources Board Clerk's Office 1001 I Street, Sacramento, CA 95814

Re: 2020 Mobile Source Strategy

Dear Chair Randolph and Members of the California Air Resources Board:

The undersigned environmental, environmental justice and community-based organizations submit these comments to the proposed 2020 Mobile Source Strategy. California Air Resources Board's Mobile Source Strategy (MSS) aims to identify the level of cleaner technology, including zero-emission vehicles, needed to meet air pollution and greenhouse gas reduction goals, and accordingly, what regulatory concepts would allow the State to achieve those deployment levels. Key rulemakings are currently underway, including the Advanced Clean Cars II (ACC II) rule for light-duty vehicles and the Advanced Clean Fleets (ACF) rule for mediumand heavy-duty vehicles, the Transport Refrigeration Unit (TRU) rule, Commercial Harbor Craft (CHC) rule, Zero-Emissions Forklift Regulation, Small Off-Road Engines (SORE), and others. In principle, these regulations should deliver levels of ZEV deployment that align with the MSS scenarios. Unfortunately, the emissions reduction and sales targets of several of CARB's proposed rules right now do not match the levels assumed in the MSS. This gap is even more troubling given that many of the MSS scenarios for some categories like light duty and heavyduty vehicles, fall short of delivering their "equal share" of reductions needed to meet the State's air quality and greenhouse gas reduction targets, meaning that shortfalls in these sectors must be compensated for by emission reductions in other, often harder to control, sectors.

Our comments focus on the gaps between MSS and currently proposed rules, the shortcomings of the MSS in meeting air quality and GHG reduction goals and areas where proposed rules can go further in reducing emissions by transitioning fleets to zero emissions sooner and more broadly.

#### 1. Light Duty Vehicles

a. The sales requirements proposed in the Advanced Clean Cars II rule are far below the requirements assumed in the Mobile Source Strategy

The graph below highlights the mismatch between ZEV sales under the MSS Scenario and the proposed ACC II requirement. While both the rule and the Mobile Source Strategy end up hitting the Governor's Executive Order of 100% ZE sales in 2035, the regulation chooses a much lower starting point, and achieves far fewer ZEV sales than the MSS requires throughout the decade.



Interim sales shares are arguably even more important

than ultimately reaching 100% ZE sales in 2035. To meet 2031 ozone deadlines, the San Joaquin and South Coast air basins need to see dramatic reductions of NOx (80% of which come from mobile sources) beginning in *this* decade. To contribute toward reductions, emissions from light duty vehicles need to trend downward *before* 2030. Thus, ZEVs must take on a majority of market share (i.e., more than 50% sales) as early in this decade as possible. In the MSS, the 50% threshold is crossed in 2027, but the ACC II would not hit that mark until 2030 – too late to be helpful for the 2031 ozone deadlines, or the 2030 climate targets.

## b. The Mobile Source Strategy's Light Duty Scenario Does Not Reach State Goals

Staff have explicitly acknowledged that meeting California's climate goals "requires a fully electrified fleet in 2045."<sup>1</sup> Unfortunately, Staff also admit that the MSS "does not go far enough." In 2045, the on-road fleet still includes 15% conventional ICE vehicles. Another 15% are plug-in hybrid. Even in 2050, only 80% of the on-road fleet is fully electrified.

<sup>&</sup>lt;sup>1</sup> CARB, 2020 Mobile Source Strategy – Presentation Script (Mar. 25, 2020) https://ww3.arb.ca.gov/planning/sip/2020mss/script\_mssmarwbnr.pdf



As a result, Staff admit that light-duty vehicles, commonly understood to be among the easiestto-decarbonize of sectors across the economy, "cannot achieve its 'equal share' of reductions for NOx and GHG emissions in 2037 and 2045 respectively for this analysis."<sup>2</sup> This underscores the urgency of strengthening the ACC II sales requirements. The current proposal fails to meet the MSS scenario, which itself is too conservative to meet our air quality and climate goals.

## c. Other policies cannot make up for weak regulations

When confronted with the gap between their rules and their models, Staff have suggested that other policies can help bridge the difference. But the MSS already relies to an unrealistic degree on alternative policies that it has less control over to meet the gap in emission reductions between the MSS and state and federal targets. It is entirely unreasonable to assume that the alternative policies can plug an even wider gap that would be left by regulations that do not match MSS assumptions.

- **Reduced VMT** The MSS assumes a 15% reduction in vehicle miles traveled (VMT) through measures like increasing infill housing and alternative mobility which CARB has only indirect influence over at best. While we strongly support VMT reduction strategies, they cannot justify allowing continued emissions from combustion and adopting a weaker ACC2 rule.
- "Low-Carbon" Fuels and Carbon Dioxide Removal These are the most absurd excuses for weak on-road regulations. First, reliance on either of these solutions when zero-emission decarbonization options exist is an environmental injustice even if the carbon from ICE vehicles could be offset or avoided through biofuels, there is no reason to accept continued health-harming pollution where it is not necessary. Further, the finite limits on both these measures means they will already need to be directed towards far more challenging sectors like shipping and aviation and therefore cannot be squandered on passenger vehicles.

<sup>&</sup>lt;sup>2</sup> CARB, Proposed 2020 Mobile Source Strategy, at 98 (September 28, 2021), available at https://ww2.arb.ca.gov/sites/default/files/2021-09/Proposed\_2020\_Mobile\_Source\_Strategy.pdf

- Accelerated Turnover CARB has suggested using additional funding to drive accelerated turnover. Unrealistic levels of accelerated scrappage are already required to bridge the gap between the MSS and the South Coast's attainment of ozone standards by 2031. Accelerated turnover to ZE of 16,000 cars every year is needed for the South Coast to attain the ozone standards a ten-fold increase compared to annual retirements in the basin through Clean Cars 4 All. If anything, it would be appropriate for Staff to consider an ACC II rule that delivers a greater number of ZEVs and ends the sale of combustion vehicles prior to 2035, to alleviate some of the need to rely on record-breaking rates of scrappage. But Staff have gone the opposite direction, setting regulations that fail to match already-conservative scenarios in the MSS.
- 2. Medium- and Heavy-Duty Vehicles

The same problem is apparent in the medium- and heavy-duty sector. As with the light-duty segment, CARB's two key regulatory measures for shifting from combustion to zero-emission medium- and heavy-duty vehicles (the Advanced Clean Trucks rule and the proposed Advanced Clean Fleets rule) fall far short of the State's goals. In 2045, when the CARB Board's resolution and the Governor's Executive Order call for trucks "everywhere feasible" to be zero-emission, half the State's truck population will remain combustion-powered under the ACT and current ACF proposal. Even in 2050, a third of the truck population will continue polluting.



MSS modeling demonstrates these targets are necessary minimum commitments to have any chance of meeting health-based air quality standards in the San Joaquin Valley and South Coast air basins, or statewide greenhouse gas reduction targets. **CARB's modeling scenario assumes all medium- and heavy-duty truck sales in California will be zero-emission beginning in 2035.** In the proposed Advanced Clean Fleets rule, CARB has clearly shown that there is an opportunity to set a 100% ZE sales mandate, but inexplicably choose to set it for 2040, instead of 2035 as the MSS assumes.

And as with the light-duty vehicle segment, failing to align the ACT and the proposed ACF with the assumptions in the MSS is even more worrisome because the MSS itself fails to achieve timely attainment of California's air quality and climate requirements. The target that CARB's ACF regulations fail to meet is not aligned with what's needed to be on track for the State's climate goals. Multiple, independent, and State-sponsored scenario studies have said roughly 350,000 trucks need to be ZEVs in 2030, and the MSS scenario only achieves about 260,000 trucks by 2031.



Again, CARB cannot justify adding to the MSS's existing shortfall with still-weaker regulations under the hope that other policies will fill the void. The MSS already assumes that more than 8,500 trucks every year starting this year (2021) will *voluntarily* be replaced with ZE trucks. For context – CARB's current goal for the year is 800 ZE trucks. Staff have not articulated any genuine plan for how to get another nearly-8,000 trucks turned over this year, or any year between now and 2030, keeping in mind that these are voluntary turnovers *above and beyond those ZE trucks that would be required by ACT and ACF requirement matching the MSS assumptions*!

The good news is that CARB's own robust – though largely conservative – total cost of ownership study shows that beginning in 2025, battery-electric trucks already deliver positive cashflows in most categories. By 2030, there isn't a single truck category without a ZE option that has a more favorable TCO than its combustion counterpart.<sup>3</sup> At that point, there is no reason why life-saving, climate-protecting alternatives should not be the default for virtually all truck sales. Therefore, in order to realize the assumptions from the MSS, CARB needs to align the 100% ZE sales mandate in the ACF to the 2035 timeline.

<sup>&</sup>lt;sup>3</sup> CARB, Draft Advanced Clean Fleets Total Cost of Ownership Discussion Document (Sept 9, 2021) at 5-6 https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc\_ADA.pdf.

Similarly, the MSS should more fully flag the failings of the San Pedro Bay Ports in achieving necessary emissions reductions. ARB should push the ports to develop a more robust program to clean up pollution.

#### 3. Off-Road Vehicle and Equipment Strategies

The Governor's Executive Order N-79-20 requires all off-road vehicles and equipment to be zero-emission by 2035 "everywhere feasible." We remain concerned that the MSS does not do sufficient work to address the large category of California Regulated Off-road Equipment. After California Regulated On-road sources, this is the second largest category of emissions with close to a quarter of the emissions in the South Coast Air Basin.

#### a. Small Off-Road Engines (SORE)

SORE and forklifts are both categories that are well suited to make a full transition to zero emissions for multiple reasons. Most of this type of equipment is already moving towards being full electric in several categories. With more products coming online that would perform necessary tasks in all-electric models, now is the time to push for zero-emissions mandates for new equipment covering these sectors. A rapid transition away from SOREs to zero-emissions equipment would reduce toxic emissions exposure and related health risks to equipment operators while reducing greenhouse gas (GHG) emissions and improving health outcomes throughout the state. The current MSS strategy and proposed regulatory scheme fail to follow the direction that the state legislature has signaled and more must be done to expedite a transition to zero emissions.

With the recent passage of AB 1346, the legislature directed CARB to institute regulations that will **prohibit engine exhaust** and **evaporative emissions** from SOREs starting in January 2024.<sup>4</sup> In passing this directive, the legislature identified SORE as a critical area for emissions reduction. The legislature further noted that "regulation for SORE have not been as stringent as for other engines" with emissions levels exceeding that of new passenger vehicles and that "without further regulation, these emissions levels are expected to increase with increasing number of SORE in California."<sup>5</sup>

The MSS states that "[c]onsidering that staff's current proposal would largely transform SORE to zero-emission technology by 2040, no additional MSS scenarios were modeled for this sector."<sup>6</sup> Given the state legislature's request for more deliberate action in this category, CARB should push for an even stronger regulatory effort to meet the more expedited pace to eliminate all SORE emissions starting in January 2024. With the development of zero emissions generators, one could imagine modeling that would result in elimination of emissions from generator models starting sooner than 2028.<sup>7</sup> In the case of back-up generators, such modeling can incorporate scenarios where the use of renewable energy microgrids are increasingly

<sup>&</sup>lt;sup>4</sup> <u>https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\_id=202120220AB1346</u>

<sup>&</sup>lt;sup>5</sup> Id.

<sup>&</sup>lt;sup>6</sup> CARB, Proposed 2020 Mobile Source Strategy, at 165 (September 28, 2021)

<sup>&</sup>lt;sup>7</sup> Id at 68.

adopted, pumped storage and fuel cell technology assist with back up energy generation without burning gasoline or diesel.

More can also be done with incentive strategies, whether directly through CARB or districts. While over half of household lawn and garden equipment is already zero emissions, commercial landscapers have had lower zero emissions adoption rates. <sup>8</sup> In particular, incentive strategies should be targeted and streamlined to support small businesses and independent operators.

b. Cargo Handling Equipment

The Governor's Executive Order N-79-20 directs CARB to adopt regulations to transition all offroad equipment to zero emission by 2035 where feasible, including cargo-handling equipment. CHE covers yard trucks (hostlers), rubber tire gantry cranes, and container handlers. Several of California's ports have made commitments to convert this equipment to zero-emissions by 2030. Staff is currently assessing a zero emission requirement for CHE that would begin in 2026 and aim for 90% ZE penetration by 2036. Given the availability and cost-effectiveness of ZE yard trucks and rubber tire gantry cranes, these should be converted fully to zero-emission on an accelerated timeline by 2030. ZE container handlers are also being demonstrated, and while potentially less advanced than yard trucks and RTGs, are likely to see significant advancement by 2026 when the regulation begins.

# c. Forklifts

Forklifts are often used at sites where emissions impact operators as well as surrounding communities. As the MSS notes, off-road measures targeting forklifts will have a particularly strong impact in communities near ports, railyards, and warehouses<sup>9</sup> already burdened by increased air pollution from goods movement activity. Regulation of these sources of emissions, while representing a smaller segment of off-road emissions overall, is imperative to ensuring that the state meets its emission reductions goals and cleaning up the air in frontline communities.

More aggressive strategies for in-use fleet phase out of internal combustion forklifts will be needed to meet both the MSS scenario and state goals. Waiting to phase out internal combustion forklifts with greater than 65 hp until 2030, for example, will prolong the conversion to zero emissions until 2040–making a full transition by 2035 infeasible. Zero-emissions forklifts are likely to become even more prevalent in the years ahead, especially in the lower-lift capacity categories. As of 2018, 46% of U.S. forklift shipments were already battery electric. <sup>10</sup> At a minimum, more should be done to phase out Class 4 and 5 models at or below 65 hp sooner than 2025. A shorter timeline to convert forklifts with greater lift capacity will also be necessary to meet state goals to transition all off-road equipment to zero emission by 2035 where feasible.

 <sup>&</sup>lt;sup>8</sup> CARB, Small Off-Road Engines: 2021 Pre-Rulemaking Workshop (March 24, 2021), Slide 15, available at <a href="https://ww2.arb.ca.gov/sites/default/files/2021-03/3.24.21%20Workshop%20Staff%20Presentation.pdf">https://ww2.arb.ca.gov/sites/default/files/2021-03/3.24.21%20Workshop%20Staff%20Presentation.pdf</a>
<sup>9</sup> CARB, Proposed 2020 Mobile Source Strategy, at 56.

<sup>&</sup>lt;sup>10</sup> CARB, Public Workshop to Discuss the Zero-Emissions Forklifts Measure (October 7, 2020), slide 14, available at <u>https://ww2.arb.ca.gov/sites/default/files/2020-11/ZE%20Forklift%20Workshop%20Final ADA.pdf</u>

#### d. Transport Refrigeration Units (TRUs)

Our organizations support CARB's pursuit of an updated rule for TRU trucks that will call for 100% transition to zero-emissions by the end of 2029. The proposed regulation will save lives and prevent adverse health harms over the next decade.

In order to achieve the assumptions presented in the MSS, however, CARB will have to advance zero-emissions in all categories of TRUs beyond truck TRUs, including trailer, shipping container, generator set, and railcar TRUs. The MSS assumes a rapid electrification scenario for all TRUs, increasing from 10% in 2024 to 100% in 2034. Following this path to fully zero-emission TRU operations will achieve much needed NOx reductions of 12 tons per day by 2031.<sup>11</sup>

CARB would be well positioned to meet the MSS scenarios for this category by embracing a regulation that sets forth a full transition to zero-emissions by 2034 for all remaining TRU categories. Given the urgency we face, it is imperative for the Board to provide staff with specific direction to return to the Board by the end of 2023 with additional zero-emissions requirements for all TRU classes.

#### e. Commercial Harbor Craft

As noted by CARB, emissions for Commercial Harbor Craft under the new baseline emissions inventory are much higher than those estimated previously for the 2016 State SIP Strategy.<sup>12</sup> Because of this new assessment, NOx emissions reductions from the 2016 SIP Baseline under the current rule concepts are minimal. CARB concludes that "more aggressive actions need to be taken in order to achieve the NOx reductions needed to meet the State's air quality goals."<sup>13</sup>

With the assumptions built into the MSS calling for quicker deployment of cleaner Tier 4 and Tier 5 technology and removal of exemptions for commercial fishing vessels, among other changes, the projected NOx emissions reductions in the South Coast are significantly more than even those estimated under the latest CHC regulatory proposal.<sup>14</sup> This presents a clear signal that CARB can do more on the regulatory front as it develops a revised CHC regulation to curb emissions even further to align with state emissions goals.

The MSS assumptions make clear that the current regulatory scheme can and must go further in reducing NOx emissions. CARB has an opportunity to align its CHC regulation with its 2020 MSS by:

• Expanding vessel categories further to include diesel-powered recreational vessels

<sup>&</sup>lt;sup>11</sup> CARB, Proposed 2020 Mobile Source Strategy, at 169.

<sup>&</sup>lt;sup>12</sup> Id at 176

<sup>&</sup>lt;sup>13</sup> Id

<sup>&</sup>lt;sup>14</sup> Id 177-178.

- Eliminating the low-use exemption for operations impacting communities identified under AB 617 as priority communities
- Enhancing new build vessel requirements creating zero emissions requirements for new tug and excursion vessels
- Removing the exemption for under 50 horsepower as contemplated in the MSS
- Removing compliance extensions
- Creating more stringent idle limits by reducing time from 15 to 10 minutes

We remain concerned about the proposed CHC rules calling for renewable diesel for all vessels starting in 2023 as renewable diesel and biofuel alternatives present a whole host of challenges to meeting GHG goals and air quality standards. Promotion of these fuels in the transportation sector, for example, has not displaced existing fossil fuel but instead has led to the expansion of combustible fuels across the sector. While use of biodiesel is projected to reduce NOx by 10%, mandating its use for CHC may divert much needed energy away from further developing and implementing zero-emissions decarbonization options. Moreover, currently the U.S. has a limited commercial-scale production of renewable hydrocarbon biofuels like renewable diesel.<sup>15</sup> As mentioned above, to the extent this fuel is to be used, it should be earmarked for sectors like shipping and aviation.

# f. Locomotives

Locomotive activity is concentrated near seaports, railyards, and other major freight hubs in California that disproportionately pollute communities of color and low-income communities with high levels of NOx and diesel particulate matter. CARB's current in-use locomotive regulation, unfortunately, does not meet the needs of these overburdened communities or the State's air quality targets. To strengthen the rule and align it with the objective of swiftly reducing and eventually eliminating emissions from combustion, we urge CARB to allow locomotive operators to use their Spending Account funds only on zero-emission locomotive technology. Funding set-asides for continued new combustion will delay relief for decades. Given the availability of a suite of zero-emission locomotive technologies (overhead catenary lines, battery-electric locomotives, fuel cell locomotives, or hybrid combinations of zeroemission options) funds should be exclusively dedicated to technologies that maximize near-term reductions while avoiding the need for additional turnover in the future.

We support CARB's requirements that all new locomotives brought into California operations be zero-emission, but believe 2030 is likely unnecessarily late for many passenger, switch, and industrial locomotives. We urge CARB to examine the possibility of a tiered phase-in of ZE only purchases for these types of locomotives starting in 2025, and deal with any feasibility exceptions on a case-by-case basis that requires operators to demonstrate the infeasibility of ZE options. Moving the phase-out date for new combustion vehicles forward to 2025 is essential for retaining a realistic chance of meeting the Governor's Executive Order goals for achieving a zero-emission off-road fleet by 2035. Moreover, this is a sensible approach given the widespread availability of overhead catenary technology and the rapidly advancing state of battery-electric locomotive technology. For the same reason, the zero-emission requirements for new line-haul

<sup>&</sup>lt;sup>15</sup> https://afdc.energy.gov/fuels/emerging\_hydrocarbon.html

locomotives must also be moved up, to 2030 at the latest. New research highlights that even these more demanding duty cycles can be readily electrified.<sup>16</sup>

# g. Construction and Earthmoving Equipment (In-Use Off-Road)

The plan should include a more stringent in-use standard for this type of equipment. We remain concerned that there is not a clear zero-emissions pathway articulated in the document. We also fear that some of the deadlines remain too far out, and CARB should work to get rid of heavily polluting Tier 0, 1, and 2 equipment as quickly as possible. Removing this equipment by 2033 is much too slow. CARB should remove this equipment by 2028 at the latest.

h. Agricultural Equipment

We remain concerned that the regulation of agricultural equipment remains a voluntary program. Under the 2020 MSS scenario for this category, funding would remain flat through 2031 at the same level it has been for the past four years without additional regulatory measures. <sup>17</sup> Modeling demonstrates that current incentives programs are incapable of achieving the level of turn over necessary to meet state goals. More must be done in the 2020 MSS to align with the Governor's Executive Order N-79-20 calling for state strategies "to achieve 100 percent zero-emissions from off-road vehicles and equipment operations in the State by 2035".<sup>18</sup>

# The Strategy Should Provide Additional Measures to Reign in Pollution from Transportation

An important aspect of cleaning our air and reducing climate pollution is reigning in poor decisions that will make the job harder. For decades, transportation investments and decisions have made it harder to achieve ambient air quality standards. Communities working to improve mobility in their communities have had to spend thousands of hours fighting poorly conceived highway and freight expansion projects that would add more pollution to their communities. A big part of the problem is transportation planning documents often dictate the terms of what transportation agencies were willing to do to advance clean air and climate goals rather than what they can and must do. We suggest approaching this a different way.

i. Use Motor Vehicle Emissions Budgets As a Tool to Direct Coherent Investments.

We ask that CARB use the important powers they have over setting Motor Vehicle Emissions Budgets (MVEB) to ratchet down the potential to invest in counterproductive expenditures that do not make air pollution better. Instead, the MVEBs should serve to push solutions to our

<sup>&</sup>lt;sup>16</sup> Natalie Popovich et al, Big Batteries on Wheels: Converting Diesel Trains to Battery Electric can Provide Significant Economic, Environmental, and Grid Resilience Benefits (Jan 2021) https://www.researchsquare.com/article/rs-142022/v1

<sup>&</sup>lt;sup>17</sup> CARB, Proposed 2020 Mobile Source Strategy, at 175

<sup>&</sup>lt;sup>18</sup> Executive Order N-79-20, available at <u>https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-</u> <u>Climate.pdf</u>

transportation pollution crisis. CARB should explore a 25% or more reduction in MVEBs to ensure our transportation system is actually helping to meet our air quality challenges. While it may take some time to see the benefits of this measures, the timeline horizons for the 2008 and 2015 8-hour ozone standards could provide a perfect amount of time to start seeing our transportation infrastructure investments do more to push us towards attainment.

ii. Include More Robust Transportation Control Measures

Another set of dramatically underutilized tools in our fights against air pollution has been transportation control measures. We recognize that some of these measures can involve difficult operational changes to our transportation system. But, it is an important tool in our arsenal. There are several transportation control strategies that we are not using that could be pursued.

To the extent there are questions of authority, CARB should explore the guidance that the federal government is supposed to provide to states on transportation control measures. In particular, section 108 of the Clean Air Act provides the EPA Administrator and the Secretary of Transportation must provide guidance on these strategies "from time to time." 42 U.S.C. § 7408(f). That section of the Clean Air Act also provides that these agencies can provide more guidance on how to protect vulnerable and sensitive populations from pollution. *Id.* § 7408(f)(1)(C). There is no more important time than now as we are trying to solve intractable air pollution and climate pollution problems.

iii. Improve General Conformity Provisions

Similarly, the use of general conformity budgets – allowing certain federal projects to skip emissions reduction – will continue to undermine Clean Air Act objectives and local efforts to protect public health. Often the "federal projects" benefiting from this loophole are some of the wealthiest corporations in the world. These large corporations have the resources to achieve matching emissions reductions relative to the harms they create but are allowed not to. These loopholes for the well-resourced have no place in future air plans.

iv. Include More Robust Contingency Measures When We Fail to Meet an Air Standard.

Finally, California has extensive experience not meeting ambient air quality standards. It is important that California create some contingency measures that will ensure operational changes to curb pollution. Large transportation sources have had decades of notice that we need to do massive amounts of reductions to meet clean air standards. If we fail to meet these legal mandates, there should be measures that push harder on zero-emissions operations in nonattainment areas.

## Conclusion

We thank CARB for taking on the challenge of eliminating the health-harming and atmospheredestabilizing impacts of our State's expanding freight and transportation system. These harms are distributed unevenly – most acutely burdening the communities disproportionately impacted by emissions from mobile sources. The Mobile Source Strategy is but one of many steps your agency must take to fulfill its obligations to make state-wide clean air policy-but it is an important one. Through the MSS, CARB has the opportunity to better align the SIP, the 2022 Scoping Plan Update, and the Community Emissions Reductions Plans towards maximizing emissions reductions across all sectors and help our state meet its clean air goals. We thank you for considering our comments and look forward to the development concrete emissions-reduction measures that will deliver relief to the many frontline communities suffering from poor air quality.

Sincerely,

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