COMMUNITIES FOR A BETTER ENVIRONMENT
established 1978

September 30, 2024

Chair Liane Randolph and
Members of the Board
California Air Resources Board
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Submitted via CARB's online Comment Submittal

Re: Comment on the Recirculated Draft Environmental Impact Analysis for the Proposed Low Carbon Fuel Standard Regulation

Dear Chair Randolph and Members of the Board,

Communities for a Better Environment ("CBE") has reviewed the Recirculated Draft Environmental Impact Analysis ("DEIA") prepared by the California Air Resources Board ("CARB") assessing the 15-Day Changes to the Proposed Low Carbon Fuel Standard Regulation ("LCFS") released on August 12, 2024.

CBE is a community-based environmental justice organization working with community members in East Oakland, Richmond, Southeast Los Angeles, and Wilmington. CBE's mission is to build people's power in California's communities of color and low-income communities. CBE strives to achieve environmental health and justice by preventing and reducing pollution and building green, healthy, and sustainable communities and environments. In East Oakland, CBE members are impacted by emissions from Oakland International Airport and affected by emissions from jet fuel combustion. Spanning Northern and Southern California, CBE members in Richmond, Southeast Los Angeles, and Wilmington are affected by the toxic emissions from fossil fuel refining and increasingly biofuels refining. CBE members in Southeast Los Angeles and Wilmington are concerned about the impacts of rapidly developing hydrogen infrastructure across Southern California in general, and in their communities in particular. A common thread across our Northern and Southern California communities is advocacy at local, state, and federal levels to develop clean, accessible transportation that reduces impacts to the near-freeway communities where we organize. Emissions from both passenger and freight transport are among the greatest impacts experienced by communities in East Oakland, Richmond, Southeast Los Angeles, and Wilmington, who breathe diesel particulate emissions where they sleep, learn, play, and pray. With this working context, CBE raises significant concerns about the impact and analysis of changes to the proposed LCFS Regulation.

While CARB implements its own certified regulatory program under the California Environmental Quality Act ("CEQA"), it remains subject to CEQA's requirements.[1] The recirculated DEIA for the proposal violates CEQA in several respects outlined below:

I. The description of the proposed changes relating to fossil fuel-based hydrogen leaves out allowances for fossil fuel-based hydrogen production accompanied by book-and-claim accounting for biomethane, leading to faulty and inaccurate analysis of the impacts of the hydrogen rule changes.
II. CARB fails to adequately examine the significant impacts of air quality, greenhouse gas emissions, and related health effects from the Proposed Changes regarding biofuels and hydrogen.
III. CARB has surreptitiously dismissed feasible options within its authority to mitigate significant environmental and health impacts.
IV. CARB has not sufficiently evaluated feasible alternatives that could lessen significant environmental impacts, in particular alternatives that involve a cap on biofuels.

I. The description of the Proposed Change regarding fossil fuel-based hydrogen is inaccurate and cannot provide an adequate basis for impact analyses or mitigation measures.

The regulatory requirements for CARB's Environmental Impact Analyses require the DEIA to include a description of the project and a description of the applicable environmental and regulatory setting for the project.[2] Even if CARB's EIA analysis is limited, certified regulatory programs must align with CEQA's policy goals and substantive standards.[3] Courts have described an accurate project description as "the heart of the EIR process" and "necessary for an intelligent evaluation of the potential environmental effects of a proposed activity."[4] A project description that omits key information about regulatory allowances and exceptions will result in inadequate alternatives analyses and mitigation measures that do not address the significant impacts the proposed changes may have.[5] Further, it prevents the public from engaging with an accurate and accountable environmental analysis.[6]

In the description of the proposed amendment to the rule changes relating to fossil fuel-based hydrogen, CARB states that the Proposed Changes remove crediting eligibility for hydrogen produced from fossil fuels. However, the 15-Day Changes allow for the continued creation of fossil fuel-based hydrogen if producers use indirect accounting via book-and-claim

[1] *POET, LLC v. State Air Resources Bd.*, 218 Cal.App.4th 681, 711 (2013); Cal. Code Regs. tit. 17, § 60004.2(c)(1)(A).
[2] CAL. CODE REGS. Tit. 17, § 60004.2(a)(1)-(2).
[3] *POET, LLC v. State Air Resources Bd.*, 218 Cal.App.4th 681, 715 (2013)
[4] *Sacramento Old City Ass'n. v. City Council* (1991) 229 Cal.App.3d 1011, 1023; *San Joaquin Raptor/Wildlife Rescue Center,* 27 Cal.App.4th at 730; *See also* CAL. CODE REGS. Tit. 14, § 15124.
[5] *See Sacramento Old City Ass'n. v. City Council* (1991) 229 Cal.App.3d 1011, 1023.
[6] *Id*.

biomethane matching.[7] This fundamental mischaracterization of the 15-Day Changes precludes an accurate and accountable environmental analysis because it does not capture the significant loophole for prolonged fossil fuel dependence that is indirect biomethane book-and-claim crediting. Without an accurate understanding of what the proposed LCFS allows, it is not possible for the analyses of impacts and mitigation measures to be adequate.

II. The Recirculated DEIA does not adequately address the impacts of the proposed rule changes.

A. CARB does not address the significant impact of air quality on health and environmental justice communities.

CARB's Regulatory Program and CEQA require that DEIAs disclose and analyze adverse impacts on human beings.[8] Health impacts resulting from adverse air quality impacts must be identified and analyzed. Ambient air quality and the presence of air toxins are obvious health concerns. Analysis of the health impacts resulting from adverse air quality impacts must disclose the severity and significance of those impacts. The DEIA should therefore analyze the impact of air quality on human health as well as disparate health impacts on disadvantaged communities and vulnerable populations.

The Recirculated DEIA only references the Health Impact Analysis in Chapter 2 of the Standardized Regulatory Impact Assessment (SRIA) issued on September 8, 2023. Despite the Recirculated DEIA's new finding that short- and long-term air quality impacts of the proposed rule changes would be significant, the DEIA does not provide any new analysis about how the extent of these significant air quality impacts will affect the health of human beings.

It is clear from CARB's own reasoning that they are well aware that the proposed changes will encourage renewable diesel to remain a substantial part of the LCFS program.[9] In fact, CARB projects that there will be an "increase in long-term operational NOx and PM2.5 emissions due to biomass and biofuel transportation as a result of the Proposed Amendments."[10] Concerningly, CARB is aware that the "air quality changes from the Proposed Amendments differ geographically based on fuel production and consumption patterns" and even anticipates "increases in local emissions associated with increased biofuel production and biomethane production."[11] The Recirculated DEIA acknowledges the relationship between increased criteria pollutant emissions and detrimental health impacts in a discussion specifically relating to the use of alternative jet fuel but does not engage with the health effects from significant air quality impacts from increasingly localized biofuels production. CARB identifies that biofuel emissions are a cause for concern, and acknowledges that these harms will be localized, but the DEIA does

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[7] Cal. Air. Res. Bd., *Proposed 15-Day Changes* §§ 95482(h) and 95488.6(i)(2) (Aug. 12, 2024). https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/15day_atta-1.pdf

[8] CAL. CODE REGS. Tit. 17, § 60004.2(a)(4); CAL. CODE REGS. Tit. 14, § 15065(a)(4).

[9] CAL. AIR RESOURCES BD., 2023 LCFS REPORTING TOOL (LRT) QUARTERLY DATA SUMMARY REPORT NO. 1 (2024) (Renewable diesel alone earns nearly 40% of the total program credits.); *see also, CARB 2024 Recirculated Draft Environmental Impact Analysis for the Proposed Low Carbon Fuel Standard Regulation* (Aug. 16, 2024) https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/recirculated_draft_eia.pdf. (hereinafter "*CARB 2024 Recirculated DEIA"*).

[10] *CARB 2024 Recirculated DEIA*, at 44.

[11] *Id.* at 44 and 53.

nothing to analyze the health effects of air quality impacts from biomass, biofuel, and biomethane production and processes.

As previously highlighted in CBE's comment on the 15-Day Changes, refinery communities have been living with the racist impacts of fossil fuel pollution for over a century and are deeply and personally aware of the need to phase out polluting refineries, including polluting biofuels refineries. In particular, refinery communities such as those near the Phillips 66 refinery in Rodeo and the Marathon refinery in Martinez experience heightened pollution burdens and asthma rates above over 80% of the rest of the state.[12] Both the Rodeo and Martinez refinery communities are designated as "disadvantaged communities" by the California Environmental Protection Agency under SB 535 based on geographic, socioeconomic, public health, and environmental hazard criteria.[13] Environmental justice communities already face air pollution levels far beyond what is considered safe for human health, and CARB acknowledges that there will be an increase in local emissions near refineries. Despite this, CARB does not analyze the adverse health effects of the significant air quality impacts from the Proposed Changes.

B. CARB's Air Quality analysis does not sufficiently analyze the range of emissions potential from specified impacts and adopts a faulty baseline for analysis.

Under CEQA, CARB must provide meaningful context to conclusions concerning significant air quality impacts and human health consequences.[14] The Proposed Changes affect discrete fuels subject to the LCFS regulation, yet the DEIA's impact analyses for both air quality and greenhouse gas emissions do not address the potential impacts as they relate to the Proposed Changes.

Despite CARB's conclusion that there will be significant air quality impacts from the proposed changes, CARB provides only minimal data on the pollutant potential of the proposed changes. In fact, CARB only includes data on fine particulate matter (PM2.5) and nitrogen oxides (NOx) for air quality analysis, and provides a limited, sweeping programmatic analysis of greenhouse gas emissions. Whereas biofuels production is known to create an array of emissions, including volatile organic compounds, and has been linked to more intensive flaring than fossil fuels.[15] Further, hydrogen production of all kinds is known to produce indirect greenhouse gas

[12] CalEnviroScreen 4.0, CAL. OFF. ENV'T HEALTH HAZARD ASSESSMENT, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/?org=OEH (last visited Aug. 25, 2024) (search for census tract 6013320001, 6013320004, and 6013315000).
[13] *SB 535 Disadvantaged Communities*, CAL. OFF. ENV'T HEALTH HAZARD ASSESSMENT, https://oehha.ca.gov/calenviroscreen/sb535 (last visited Aug. 27, 2024) (see "Disadvantaged Communities Map" and search for census tracts 6013358000, 6013320001, 6013320004, and 6013315000).
[14] *Sierra Club v. Cnty. of Fresno*, 6 Cal. 5th 502, 522, 431 P.3d 1151, 1165 (2018).
[15] *Phillips 66 Rodeo Renewed Project (File No. LP20-2040) – comment concerning draft environmental impact report* at 38, submitted by Communities for a Better Environment and other environmental organizations (Dec. 17, 2021), available at https://www.nrdc.org/sites/default/files/rodeo_renewed_deir_comment.pdf; Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief at 11, *Communities for a Better Environment v. City of Paramount*, Los Angeles County Central District Superior Court, available at https://climatecasechart.com/wp-content/uploads/case-documents/2022/20220516_docket-na_petition-for-writ-of-mandate.pdf.

impacts as hydrogen inevitably leaks.[16] The specific air quality and greenhouse gas emissions impacts of biofuels refining and hydrogen production are particularly concerning for the refinery communities who live, work, play, and pray in the air around these producers with potential health impacts from pollutants. By failing to account for them in the recirculated DEIA, CARB has not satisfied CEQA.

CARB's analysis of both particulate matter and greenhouse gas emissions also centers overall emissions reductions when contextualizing localized emissions. This model of impact analysis fails to provide an adequate basis for understanding alternatives and mitigation options because it conflates the general benefits of the program with the acute impacts of fuel pathways.

The Altair Biofuels facility in Paramount, California is a decisive example of misleading, generalizing baselines with real life community health impacts. The Altair Paramount refinery went offline in 2011 but came back online and began taking small steps towards creating biofuels in 2013.[17] By 2018, the environmental justice community of Paramount went from facing no production pollution to 25,000 barrels per day of polluting biofuels production.[18] The Environmental Impact Report for the expansion project to create biofuels estimated that the expanded refinery would release 1,743 pounds of VOCs and 2,133 pounds of NOx emissions per day, and it would require 50 rail car unloads per day and 540 diesel truck trips.[19] Biofuels production has the potential to produce significant localized emissions. A comparative analysis that includes emissions reductions from the entire program obfuscates the emissions and impacts of increased biofuels refining amidst the overall benefits of the program. The Altair Paramount scenario highlights that CARB is using the incorrect baseline for analysis of emissions for refineries and refinery communities. The baseline should be as if there were no refinery, since without the biofuels conversion project, there would be no refinery, and this would more accurately should the impacts to the environment. A baseline for future pollution that upholds the legacy of pollution in these communities cements the environmental injustice these communities have historically faced into the future and an *un*just transition into a lower carbon future where they are still disproportionately harmed.

Failing to adequately analyze air quality impacts, and greenhouse gas emissions prevents these communities from understanding the risks they face. It also prevents a fruitful discussion of program alternatives and mitigations that could better address these discrete unanalyzed harms.

C. The impacts analysis fails to address cumulative impacts.

The DEIA must include a discussion of the cumulative and growth-inducing impacts of the proposed rule changes.[20] Cumulative impacts include the effects of past, present, and future

[16] *Climate Impacts of Hydrogen and Methane Emissions Can Considerably Reduce the Climate Benefits across Key Hydrogen Use Cases and Time Scales* Env'tal Science and Technology (Feb. 2024) (avail. At https://pubs.acs.org/doi/10.1021/acs.est.3c09030)

[17] Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief at 11, *Communities for a Better Environment v. City of Paramount*, Los Angeles County Central District Superior Court, available at https://climatecasechart.com/wp-content/uploads/case-documents/2022/20220516_docket-na_petition-for-writ-of-mandate.pdf.

[18] *Id.*

[19] *Id.* at 12–13.

[20] CAL. CODE REGS. Tit. 17, § 60004.2(a)(4); CAL. CODE REGS. Tit. 14, § 15065(a)(3).

actions. The cumulative impact from several projects is the change in the environment which results from incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects.[21] CARB does not perform any cumulative analysis at all, in fact the word "cumulative" does not appear in the Recirculated DEIA. Discussion and analysis of cumulative and growth-inducing impacts is essential when considering the array of impacts identified from the proposed changes. Further, cumulative impacts analysis is important to understanding the historical burden and legacy of pollution for refinery communities.

D. CARB improperly concludes that the proposed changes will have no significant impact on odors, despite evidence otherwise.

The Recirculated DEIA's finding that long-term operational impacts from odors are less than significant is likely incorrect because it overlooks odor impacts at biofuel refineries. In both the Phillips 66 Rodeo and Marathon Martinez refinery conversions, the Environmental Impact Reports for both conversion projects found that odor impacts could be significant without mitigation measures.[22] Although the elimination of petroleum refining has beneficial impacts on refinery odors, the use of animal-based feedstocks can create odors similar to those from animal and food processing facilities.[23] The risks of these odor impacts led Contra Costa County to require odor mitigation measures at both biofuel refineries. Given these findings of significant odor impacts from specific biofuel refinery facilities, CARB should reconsider its finding of less-than-significant odor impacts.

III. CARB has feasible options, within its authority, to mitigate significant air quality impacts.

CEQA requires CARB to identify feasible mitigation measures that would "substantially lessen the significant environmental effects" of the proposal.[24] "Feasible" mitigation means measures "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."[25] Contrary to what the Recirculated DEIA concludes, CARB has feasible options to mitigate the air quality impacts of the proposal.

The Recirculated DEIA correctly concludes that Short-Term Construction-Related and Long-Term Operational-Related Impacts on Air Quality are significant, although as outlined above it does not thoroughly or adequately discuss the causes of local emissions increases.

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[21] *Kings Cty. Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 729; *Friends of the Eel River v. Sonoma Cty. Water Agency* (2003) 108 Cal. App. 4th 859, 868-69.
[22] *Communities for a Better Environment v. County of Contra Costa*, Contra Costa County Superior Court Case No. N22-1080, at 17 (Jul. 21, 2023); *Communities for a Better Environment v. County of Contra Costa*, Contra Costa County Superior Court Case No. N22-1091, at 14 (Jul. 21, 2023).
[23] Contra Costa Cnty. Dep't of Conservation and Dev., *Draft Environmental Impact Report (County File# CDLP20-02040)*, at 4.3-79 (Oct. 2021), https://www.contracosta.ca.gov/DocumentCenter/View/72880/Rodeo-Renewed-Project-DEIR-October-2021-PDF.
[24] CAL. PUB. RESOURCES CODE § 21002.1; CEQA GUIDELINES § 15126(a); CAL. CODE REGS. Tit. 17, § 60004.2(c)(2).
[25] CAL. PUB. RESOURCES CODE § 21061.1.

CARB estimates that "localized increases in emissions" could occur near biofuel production facilities, routes for biofuel feedstock, and routes for finished fuel transportation.[26] The proposed changes to hydrogen also underscore that CARB should also consider potential local increases in emissions around facilities that produce fossil-based hydrogen matched with biomethane credits (for example, at the Shell Energy natural gas-based hydrogen facilities in Carson and Wilmington).[27]

The Draft EIA's conclusion that air quality impacts are unavoidable is not correct. CARB continues to argue that there are no feasible mitigation options because CARB does not have authority to require implementation of mitigation for projects that are under control of local and state land use and permitting authorities. However, as previously raised in CBE's prior comments, there are many feasible mitigation options that are squarely within CARB's authority.

First, CARB can require, as a condition for earning LCFS credits, that trucks carrying feedstocks and finished fuels to and from biofuel, hydrogen, and biomethane facilities are zero-emissions vehicles. CARB has authority to place conditions on pathway holders (for example, the proposal would impose sustainability certification conditions on pathway holders for crop-based biofuels). CARB also has authority, which it deploys in the Advanced Clean Fleets Rule, to require fleets to phase in zero-emission vehicles. And thanks in part to CARB's groundbreaking vehicle emissions regulations, the use of zero-emission trucks is a feasible technology option to use for mitigation.

Second, CARB can prohibit or invalidate approval of pathways at facilities that are out of compliance with state and federal air quality regulations. This is a common-sense, necessary measure to ensure that the LCFS does not continue incentivizing unlawful releases of air pollution. For example, in 2021 CARB approved three pathways for Phillips 66 Rodeo to produce renewable diesel, despite receiving notice via the pathway application comments that the facility was under investigation by the Bay Area Air Quality Management District for operating an unpermitted renewable diesel hydroprocessing unit.[28] CARB has clear authority to prevent these situations, as CARB's Executive Officer can "restrict, suspend, or invalidate credits" that are "generated... in violation of other laws, statutes, or regulations."[29] This option is also plainly feasible, because it merely requires compliance with existing air quality regulations.

Third, CARB can prohibit approval of pathways that produce significant air pollution in areas out of attainment with air quality standards, and/or in environmental justice communities. This would be highly effective in mitigating localized air pollution impacts, and it fits squarely

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[26] CARB *2024 Recirculated DEIA* at 54.
[27] *See, e.g.*, Low Carbon Fuel Standard Tier 2 Pathway Application No. B0348, Shell Energy (certified Sep. 29, 2022), https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/tier2/b0348_cover.pdf; Low Carbon Fuel Standard Tier 2 Pathway Application No. B0349, Shell Energy (certified Sep. 29, 2022), https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/tier2/b0349_cover.pdf (hereinafter "Shell Hydrogen Pathway Applications").
[28] *Comments on Phillips 66 – Application No. B0241 for Three Low-Carbon Fuel Standard Tier 2 Fuel Pathways*, submitted by Communities for a Better Environment & Natural Resources Defense Council (Dec. 17, 2021), available at https://www.arb.ca.gov/lists/com-attach/905-tier2lcfspathways-ws-BXVdbVRjBAhWPABj.pdf?_ga=2.161580924.1729481274.1707759900-1149230758.1693940701.
[29] CAL. CODE REGS. Tit. 17, § 95495(a).

within CARB's authority to decide which fuel pathways are eligible to receive credits under the program.

These are just three examples of feasible mitigation options that CARB should consider before concluding that air quality impacts are unavoidable.

IV. The DEIA should include alternative scenarios that include a cap on credits for biofuels.

CARB's certified regulatory program requires CARB to produce Environmental Impact Analyses analyzing whether any feasible alternatives are available that would substantially lessen any significant environmental impacts.[30] The alternatives should "consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."[31] A recirculated analysis is required when significant new information is available regarding substantial adverse environmental effects, or feasible ways to mitigate and project alternatives.[32]

The Recirculated DEIA does not contain or address an alternative that caps credits for biofuels. The cap alternative was not included in the initial DEIA either, despite being a feasible project alternative that would mitigate adverse environmental impacts of the program. The twenty percent companywide limit proposed in the 15-day changes acknowledges the significant environmental impacts that stem from the high supply of credits for biofuels. The initial DEIA depended primarily on the stringency of carbon intensity targets, providing only minor variants in the supply of different types of credits. In comments on the initial DEIA, CBE flagged that these alternatives failed to significantly change the environmental impacts of the proposal as they relate to biofuels.[33] A market-wide volumetric cap on lipid-based biofuels credits is an essential alternative that must be analyzed in order for CARB and the public fully evaluate the range of regulatory options and their environmental impacts.

This failure is particularly troubling because CARB is, in fact, considering a regulatory option that includes limiting biofuels. "Alternative 1" in the ISOR's "Evaluation of Regulatory Alternatives" is a scenario with lower carbon intensity stringency and a limit on virgin crop-based biofuels, which is similar to the proposed rule offered in the August 2024 15-Day Changes. The Recirculated DEIA is a second opportunity to include a volumetric cap on biofuels alternative in the DEIA, after it was called for in the Comprehensive EJ Scenario requested by EJAC and repeatedly requested in feedback from stakeholders. Yet CARB has again failed to include a biofuels cap or any new alternatives analysis in the Recirculated DEIA. Including a biofuels cap scenario in the EIA would enable consideration of a variety of environmental resource impacts that are not studied in the ISOR. By excluding a biofuels cap scenario from its CEQA analysis, CARB fails to evaluate an alternative that could effectively mitigate the

[30] CAL. CODE REGS. Tit. 17, § 60004.2(a)(5).
[31] *Id*.; CAL. CODE REGS. Tit. 14, § 15126.6 (a).
[32] CAL. CODE REGS. Tit. 14, § 15088.5 (a).
[33] *CBE Comments on the Proposed 2024 Low Carbon Fuel Standard Regulation* (Feb. 20, 2024), https://www.arb.ca.gov/lispub/comm/iframe_bccomdisp.php?listname=lcfs2024&comment_num=6984&virt_num=313.

overburdened market for biofuels credits, as well as limit the incentives and therefore impacts of biofuels refining. The proposed company-wide limit change acknowledges that limiting biofuels is necessary, CARB's CEQA analysis should consider the dutifully raised alternative of a volumetric, market-wide biofuels credit cap alternative.

In the Recirculated DEIA "CARB concludes that long-term local air quality impacts associated with the Proposed Amendments could be potentially significant and unavoidable."[34] Analyzing a biofuel cap alternative in the EIA would enable CARB to evaluate whether a reduced supply of biofuel credits could reduce the significant impacts identified in the initial DEIA and again underscored in the Recirculated DEIA. In order to comply with requirements under CEQA to analyze alternatives, CARB must incorporate a cap on biofuels in another recirculated DEIA.

V. Conclusion

In sum, the proposed changes pose unknown substantial and unacceptable risks to California residents, and in particular will increase the pollution burden felt by communities nearby refineries. The details of the proposed changes significant environmental and public health impacts are impossible to determine from the recirculated draft EIA, which omits key analyses, details, and supporting documents. For all these reasons, CARB must undertake a broad revision of the recirculated EIA that fully assesses and mitigates the proposed changes environmental and public health harms, including those identified above, and provides all supporting information documents, and data. In light of the recirculated draft EIAs present inadequacy as an informational document which deprives the public of a meaningful opportunity to review and comment, CBE respectfully requests the Recirculated DEIA be revised and recirculated with the necessary information.

Sincerely,

Lauren Gallagher
Attorney & Legal Fellow
Communities for a Better Environment

[34] *CARB 2024 Recirculated DEIA* at 43.