



Tiffany Roberts

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Submitted electronically at: <http://www.arb.ca.gov/lispub/comm/bclist.php>

December 7, 2020

The Honorable Mary Nichols
California Air Resources Board
1001 I Street, Sacramento, California 95814

RE: Comments on the Draft 2020 Mobile Source Strategy

Dear Chair Nichols,

On November 24, 2020, California Air Resources Board (CARB) released the Draft 2020 Mobile Source Strategy¹ (2020 MSS) as an update to the September 30th Discussion Draft document.² The Western States Petroleum Association (WSPA) notes with great concern that the updated 2020 MSS draft continues to fail to satisfy SB44 requirements, as detailed in our comment letter³ dated October 21, 2020. In addition to highlighting this major shortcoming, WSPA would like to provide the following comments on the 2020 MSS draft.

Need for a Comprehensive Multi-Technology Analysis

WSPA continues to emphasize the need for a multi-technology analysis that assesses the potential to meet state climate and air quality goals using more than a single technology approach. This analysis should include, among other pathways, a review of low-NO_x vehicle technologies and renewable fuels, as described in our previous comment letter.³ Such an analysis will allow for identification of the most expeditious and cost-effective paths for achieving both near-and long-term emission reductions needed across the state and, most urgently, in disadvantaged communities.

Need for a Robust Stakeholder Process

The November 2020 MSS draft writes that CARB has “engaged in a robust public process through the development of the 2020 strategy”.¹ Nonetheless, CARB staff has not responded to requests for a comprehensive multi-technology analysis nor have they provided a response as to why such an analysis cannot be conducted. As with other regulatory processes, CARB should prepare responses to stakeholder comments as part of the next release of the 2020 MSS and conduct the stakeholder engagement process as transparently as possible.

1 2020 Mobile Source Strategy Draft. Available at https://ww2.arb.ca.gov/sites/default/files/2020-11/Draft_2020_Mobile_Source_Strategy.pdf. Accessed: December 2020.

2 2020 Mobile Source Strategy Discussion Draft. Available at https://ww2.arb.ca.gov/sites/default/files/202009/Workshop_Discussion_Draft_2020_Mobile_Source_Strategy.pdf. Accessed: December 2020.

3 WSPA Comment letter on the September 30th, 2020 MSS Discussion Draft. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-11/WSPA_Comment-WorkshopDiscussionDraft2020MSS.pdf. Accessed: December 2020.

Additionally, the December 7th comment deadline for the 2020 MSS draft released on November 24th provided less than 2 weeks for stakeholders to comment. Given the extremely tight comment deadline and that the 2020 MSS draft will now be presented as an informational board item at the December 10th/11th board hearing, CARB needs to provide opportunities for stakeholder engagement in the development of the final 2020 MSS, including public workshops and adequate commenting schedules.

Conclusions

WSPA recognizes the challenges that California and CARB face in meeting its air quality improvement and greenhouse gas reduction goals. The transportation sector will be integral in any solution. WSPA appreciates the opportunity to comment on the 2020 MSS draft and looks forward to further discussions of the next 2020 MSS document.

Sincerely,

A handwritten signature in blue ink that reads "Tiffany K. Roberts". The signature is fluid and cursive, with the first name "Tiffany" being the most prominent.

Tiffany K. Roberts,
Vice President, Regulatory Affairs
Western States Petroleum Association