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**MOBILE SOURCE PLAN FOR PM2.5  
ATTAINMENT IN THE SAN JOAQUIN VALLEY**



The following are strengths of CARB's Mobile Source Plan:

- **CARB worked collaboratively with the San Joaquin Valley Air District and advocates to create a stronger PM2.5 Plan.** CARB committed to additional NO<sub>x</sub> reductions above and beyond the 2016 State Implementation Plan commitments.
- **The majority of mobile-source reductions needed to meet the PM2.5 standards will come from regulatory actions** associated with new regulatory measures and the implementation of existing control programs. This includes a new agricultural tractor rule, the first of its kind in California.
- **CARB staff continues to host conversations with advocates** concerning ways in which the plan can be improved.

However, there are many contingencies upon which attainment relies:

- **The proposed plan relies on approximately \$5 billion in incentive funding**, most of which has no identified funding source.
- **The proposed plan assigns emission reductions to the federal government.** Almost one ton of NO<sub>x</sub> reductions per day is expected from a federal low-NO<sub>x</sub> standard and more stringent national locomotive standards.
- **The proposed plan relies on state legislative action.** Implementation of the *Heavy-Duty Vehicle Inspection and Maintenance Program* measure requires passage of Senate Bill 210 (Leyva, 2018), a bill that failed this legislative session. Prospects for passage remain uncertain.
- **The proposed plan may be based on an inaccurate inventory of NO<sub>x</sub> emissions.** Recent research conducted by the University of California, Davis reported fertilized soils in the Central Valley are a previously unrecognized source of NO<sub>x</sub>, potentially increasing the NO<sub>x</sub> budget by 20 to 51%.

In the advent of changing funding priorities, an uncooperative federal administration, or a downturn in the economy or cap-and-trade auction proceeds - among other contingencies - CVAQ pushes CARB to **develop stronger regulations, develop stronger contingency measures, and to prepare regular updates to track and ensure attainment.**



# MOBILE SOURCE PLAN FOR PM<sub>2.5</sub> ATTAINMENT IN THE SAN JOAQUIN VALLEY

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## A Stronger Plan

- **Accelerate Agricultural Tractor Rule:** Attainment of the Valley's PM standards is required by no later than 2025. Implementation of a backstop regulation for the turnover of agricultural equipment should therefore be set at 2025, not 2030.
- **Increase Enforcement:** Increase enforcement personnel and direct enforcement resources to the San Joaquin Valley.
- **Target Investments:** Target investments in, and funding to outreach to, the Valley's most overburdened communities.
- **Strengthen and Expedite Advanced Clean Truck Rule:** Institute more aggressive sales requirements, commit to an expeditious timeline, and pair the manufacturer sales requirement with a fleet rule that would help create demand.
- **Adopt Fleet Rules:** The Governor directed CARB to explore options for accelerating the electrification of fleets. CARB's plan should include commitments for completing these rules, and include immediate targets for state and municipal fleets, including school buses.
- **Develop Inspection and Maintenance Program for Heavy-Duty Trucks**  
**Now:** Clarify existing authority and start development of the program now.

## Stronger Contingency Measures

We ask for CARB's current contingency measure – increased enforcement resources directed to the Valley - to be part of the plan, and stronger measures put in its place.

## Regular Updates

CARB staff should report to the Board regularly on incentive funding and emission reductions garnered to date, and identified funding sources for the following year. Research concerning agricultural sources of NO<sub>x</sub> and the significance of ammonia reductions as a control strategy for PM<sub>2.5</sub> should be regularly addressed as well.

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