



November 27, 2024

Austin Hicks
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Via email: MSS@arb.ca.gov

Comments on Draft Mobile Source Strategy 2025

Dear Mr. Hicks:

The American Lung Association offers the following comments and recommendations on the Draft 2025 Mobile Source Strategy (Draft). The Draft provides an important landscape of emission control programs, potential avenues for additional reductions and the need for ongoing attention to transportation as a leading source of California's air, climate and health equity challenges.

Building on previous efforts, the Draft highlights that California has ambitious work ahead to meet health-protective clean air and climate standards. Given that the complete 2025 strategy will inform the climate change Scoping Plan, State Implementation Plans and local Community Emission Reduction Plans, we encourage the staff to include clear emission reduction metrics (e.g., tons per day by 2037) for identified strategies and scenarios. We also encourage strategies and scenarios that strengthen existing policies to account for gaps in prior planning efforts, shortcomings of state laws/budgets or other shortfalls in emission reduction efforts.

We appreciate the staff's openness to input and conversations about the development of the plan and offer concepts for consideration below:

Focus on Zero Emissions: CARB must maintain its commitment to zero-emission pathways in the transportation sector and maintain that *only* non-combustion technologies are considered "zero-emission" within CARB programs, definitions and incentive program eligibility. Too often, combustion-based technologies or fuels are touted as "close enough" or "near-zero" but continue to impact local or regional air quality while seeking credits under CARB programs. These technologies have a place, but it is not within zero-emission policies or incentives.

Focus on Health Disparities: We support the attention given to better address disparities in pollution burdens experienced by disproportionately impacted communities. The Draft notes that California "... must thrive to act even more quickly and target the introduction of cleaner and zero-emission vehicles and equipment in the communities that for decades have been bearing the brunt of fossil fuel extraction, refining and combustion emissions." CARB policies and incentive programs must prioritize reducing harm in our most overburdened communities while meeting regional and statewide emission reductions needs.

Legacy Fleets: Key to addressing health disparities is addressing legacy fleet emissions, including those from passenger cars, heavy-duty trucks, agricultural, construction and other off-road equipment, locomotives and other major sources of diesel exhaust that harm the most

vulnerable and over-burdened communities. A few areas for consideration for addressing legacy fleet emissions:

- **Immediately identify actionable steps for development of Zero-Emission Truck regulation** as an avenue to retire aging, higher-polluting trucks reaching useful life benchmarks. That measure was included in the 2022 SIP to achieve 14.3 tons per day of NOx emission reductions statewide by 2037. CARB must prioritize clear, actionable strategies in advance of this rulemaking which is targeted for adoption in 2028. To date, staff have identified a range of options for developing the rule depending on new or existing authorities: CARB must develop these concepts in parallel to avoid delays.
- **CARB must maintain focus on Vehicle Miles Traveled** in the face of increasingly aging fleets of passenger vehicles that will operate for decades beyond the new vehicle zero-emission sales requirements set for 2035.
- **CARB must maintain focus on aging locomotive and other off-road fleets** in California and should identify additional operational measures, emission testing and other strategies to curb emissions from this major source of local health impacts.

Increased intervals for in-use testing: Building on the focus on legacy fleet emissions, CARB should explore opportunities to strengthen existing in-use testing programs at more frequent intervals to identify excess emissions and opportunities for earlier repair. For example, the Clean Truck Check program's health and emissions benefits will significantly increase with more frequent intervals that will come online following early years of implementation.

- CARB should evaluate scenarios wherein state in-use testing intervals increase in frequency (*e.g.*, biennial to annual, annual to biannual/quarterly) to illustrate potential emissions benefits while also considering strategies needed to address affordability, feasibility and equitable outcomes of such actions.

Vehicle Miles Traveled: We support the ongoing focus on Vehicle Miles Traveled (VMT). As noted in the most recent SB 150 data update by CARB, emissions and miles driven continue to increase in California. Despite 15 years of effort to implement Senate Bill 375, the divergence of local, regional and state priorities and authorities has not produced a clear pathway to building healthy, sustainable communities for all Californians. VMT reduction must remain a focus within all state-level planning with clear, actionable input from local and regional partners.

- **Specific NOx and GHG outcomes for vehicle travel:** CARB should lay out additional pathways for specific NOx, particle and GHG for inclusion in future State Implementation Plans and Scoping Plan updates.
- **VMT reductions are additive to zero-emission passenger vehicle deployment.** VMT reduction efforts must not be abandoned as the result of California's leadership in zero-emission vehicle deployment. VMT reduction strategies are crucial, additive components of meeting air quality and climate standards in the near-term and will remain so as the aging fleet of combustion vehicles operates in California well after 100% zero-emission sales requirement takes effect in 2035.
 - o Further, reductions in VMT should also be associated with appropriate attention given in to non-exhaust emissions, such as tire-wear, which the Draft notes will be an increasingly important area as combustion emissions decline.

Thank you for your ongoing work on the 2025 Mobile Source Strategy and for considering our comments.

Sincerely,

Will Barrett
Senior Director
Nationwide Clean Air Advocacy