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Karen Magliano
California Air Resources Board
Office of Community Air Protection
P.O. Box 2815
Sacramento, CA 95812

Subject: Assembly Bill (AB) 617 Community Air Protection Program Framework Concept Paper

Dear Director Magliano:

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on the California Air Resources Board's (CARB) Community Air Protection Program Framework Draft Concept Paper (Concept Paper), dated February 7, 2018. SoCalGas supports the implementation of AB 617 and looks forward to working with CARB and local air district staff, as well as members of the community to reduce emissions of toxic air contaminants and criteria pollutants in communities burdened by air pollution. Our comments are organized as follows:

I. Guiding Principles

The Community Air Protection Program (Program) should treat all fuel sources equally and be technology neutral.

II. Strategies to Reduce Emissions and Exposure

Strategies to reduce criteria air pollutants and air toxics at the community level should be cost-effective and technologically feasible.

***III.* Community Engagement**

SoCalGas supports the development of the community steering committee to drive the development and implementation of Community Emissions Reduction Programs.

***IV.* Technology Clearinghouse**

SoCalGas encourages CARB to work closely with the air districts in the development of the Technology Clearinghouse.

Guiding Principles

The Guiding Principles for Program development should treat all fuel sources equally and be technology neutral, while acknowledging that different fuel technologies may be more suitable for different types of business operations. Pursuing diversity in fuel choices, including zero and near-zero emission technologies, will help maximize compliance flexibility, and at the same time, bolster innovation and promote cost reduction through competition.

SoCalGas was actively involved in South Coast Air Quality Management District's (SCAQMD) efforts to develop a technologically sound, fuel and technology neutral Air Quality Management Plan (AQMP). As stated in the AQMP, "all technologies and fuels should be able to compete on equal footing to meet environmental needs.[1]" SoCalGas encourages CARB to include language in the Program's guiding principles that is consistent with the approved 2016 AQMP, which is a component of the State Implementation Plan. Policies and requirements that are performance-based and technology and fuel-neutral can maximize toxic air contaminant and criteria pollutant emission reductions in a feasible, cost-effective manner in communities burdened by air pollution.

Accordingly, SoCalGas specifically recommends that Guiding Principle number 9 on page 5 of the Concept Paper be revised to reflect the importance of deploying fuel-neutral technologies to maximize emission reductions as quickly as possible. The communities selected for AB 617 programs deserve to have access to all technologies that will improve their public health.

Strategies to Reduce Emissions and Exposure

SoCalGas agrees that "each community will require a different combination of strategies based upon the nature of each air quality challenge[2]." However, the proposed approaches for reducing criteria air pollutants and air toxics at the community level need to be affordable and technologically feasible. In addition, affordable, commercially-available clean air technologies that can dramatically reduce air pollution in impacted communities now should be prioritized as a near-term strategy to reduce emissions from mobile and stationary sources.

Immediately addressing mobile source criteria air pollutants is critical to public health. Heavy-duty, long-haul trucks are the largest source of both oxides of nitrogen (NOx) and greenhouse gas emissions within the freight sector.[3] Communities most impacted by air pollution are often located near transportation corridors and freight hubs. The use of ultra-low NOx vehicles can significantly reduce air pollutants in these communities. Ultra-low NOx natural gas engines[4] can reduce NOx

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[1] South Coast Air Quality Management District. Final 2016 Air Quality Management Plan. Chapter 4: Control Strategy Implementation, p. 4-9.
http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

[2] California Air Resources Board. Community Air Protection Program Draft Concept Paper.
https://ww2.arb.ca.gov/sites/default/files/2018-02/capp_concept_paper_february_2018.pdf

[3] CARB's Mobile Source Strategy, Exec. Summary p. 5, available at:
https://www.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf

[4] Low-NOx natural gas engines are those that meet the CARB Optional Low-NOx Emission Standard of 0.02 grams of NOx per brake horsepower per hour (g/bhp-hr), which is 90% lower than its diesel counterparts, and are available *today* for Class 7 and 8 heavy duty operations. Both 11.9 and 8.9-liter Cummins Westport engines have been certified to 0.02 g/bhp-hr, the lowest of the three Optional Low-NOx Standards. The certification level for both engines was 0.01 g/bhp-hour, half of the standard.

emissions by ninety percent. As numerous studies show[5], diesel engine exhaust increases asthma, heart disease, and cancer risk for residents and plagues Southern California with ozone and smog. To mitigate the harmful health impacts of living near transportation corridors, it is critical that technology solutions that are available today are immediately deployed.

Community Engagement

SoCalGas supports strong community partnerships to develop and implement community emissions reduction programs, and strongly believes that local businesses and industry stakeholders should be a part of each community steering committee. While policy-makers understand the science, economics and policy implications of their decisions, local communities acutely know what their constituents need and will have a strong sense of the urgency of those needs. As such, the steering committee should be inclusive and equitable, thereby bringing diverse perspectives to the table to collaborate on feasible solutions to air quality problems in the most impacted communities.

SoCalGas is dedicated to improving the quality of life in the communities we serve, and we look forward to being involved in the community engagement process.

Technology Clearinghouse

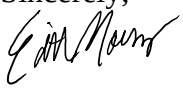
SoCalGas recommends that CARB make clear that application of Best Available Control Technology (BACT) and Best Available Retrofit Control Technology (BARCT) are facility-specific inquiries. BACT review is triggered by permitting actions, which are under the purview of a local air district. To establish that a technology is BACT, an air district must confirm that the maximum degree of reduction of each pollutant subject to regulation has been achieved in practice for a category or class of source. Further, air districts, including SCAQMD require that economic and technical feasibility be considered for establishing BACT for each class and category of sources. This analysis is conducted on a case-by-case basis.

SoCalGas cautions that the Technology Clearinghouse could mislead communities into thinking that certain technologies are broadly applicable as BACT, and encourages CARB to work closely with the air districts to develop a Technology Clearinghouse that allows the community to select technologies that are appropriate for their region including the specific air districts where they may apply.

Conclusion

SoCalGas appreciates CARB's consideration of these comments. We look forward to continuing to offer safe, affordable, and reliable technology solutions to reduce emissions in communities most burdened by air pollution. Please do not hesitate to contact me for more information.

Sincerely,



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[5] California Air Resources Board. Overview: Diesel Exhaust and Health. https://www.arb.ca.gov/research/diesel/diesel-health.htm