



October 12, 2021

Wayne Nastri
 Executive Office
 South Coast AQMD
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Dear Mr. Nastri:

We write in response to your August 3, 2021 letter expressing dismay over our organizations' push for a zero-emissions future. Last year was the worst ozone season in three decades in the South Coast and parts of California have literally been on fire this year; if there were ever a moment to double down on a zero-emissions future, it is now. California's air agencies have pursued a combustion-based strategy for attaining state and federal clean air standards for decades. The promise has been that we can incrementally clean up combustion engines to meet ozone standards and make it safe to breathe in some of the most overburdened communities in the country. This promise has not materialized. Our communities continue to breathe amongst the most polluted air in the nation, and we need a new strategy.

We recognize that we have a common enemy in diesel engines. The difference is we do not believe the natural gas industry is a trusted and useful ally in the fight to rid our communities of diesel. In fact, we have consistently found that the natural gas industry is the biggest obstacle to achieving zero-emissions. They are consistently clawing and fighting to stop zero-emission technologies (mainly electric vehicles) from gaining market share in venues throughout California. They have attempted to pressure the Public Utilities Commission to restrict building necessary charging infrastructure targeted for our communities to achieve a zero-emission future. They have paid community members to testify at the Ports of Los Angeles and Long Beach in support of natural gas trucks. And they have shown up at Metro meetings to advocate for use of public funds to subsidize natural gas trucks as part of the I-710 Clean Trucks Program. Now the District is carrying their banner.

We also disagree with the District that natural gas is the central tool to fight diesel exhaust. While the South Coast AQMD has many technical experts on staff, which we respect, the agency has been wrong on the attainment issue in every ozone plan it has ever produced. Our point is that until you break up with fossil fuels, you will continue to fail. We understand that this is politically hard. The fossil fuel interests have made it that way. However, there is no pathway to safe air or attainment that does not eliminate combustion everywhere possible, which includes trucking. This factors in that eliminating combustion in certain sectors like the marine and aviation sectors will be very hard. So, we cannot afford to take a detour on combustion for equipment like trucks that will be easier to transition to zero-emissions.

We do not approach this issue from a place of ignorance as your letter insinuates. Instead, we come to this issue from a place of deep understanding of past failures and the limits of combustion, and the pollution-control devices that fail or erode any proclaimed benefits outside of the labs. In fact, when combined with systems that do not create accountability, any claimed emissions benefits from incrementally cleaner combustion technologies may be illusory. For example, evidence shows that improper maintenance is one of the leading causes in the deteriorating results for emissions benefits from natural gas trucks. Maintenance of trucks, whether diesel or natural gas, in the South Coast is only made worse by misclassification: no matter how many natural gas trucks are put on the roads, if drivers are left unsupported they often cannot properly maintain those trucks or delay maintenance, making natural gas trucks as bad as diesel trucks for certain pollutants. What we know from decades of work in communities is that the time to pivot to a zero-emission strategy is now.

In that vein, we have three specific requests for your agency.

Request 1: Stop advocating to weaken the Advanced Clean Fleets rule.

Asking the California Air Resources Board to credit the purchase of trucks that are not zero-emissions is a request to weaken the Advanced Clean Fleets Rule, plain and simple. To the extent the District wants to encourage companies to buy natural gas trucks, there are other regulations and approaches that can be used. Please do not continue to advocate to weaken this rule that is so important to our communities.

Request 2: Stop parroting industry talking points about zero-emissions.

We recognize the benefits to the gas industry of creating a wedge between your agency and environmental justice and environmental advocates. But this wedge only serves to harm breathers in the region. Your August 3 letter was weaponized when it was immediately put in the hands of gas industry advocates. Some of us were approached by press before we had a chance to even read the letter because it was sent to reporters by gas lobbyists and advocates. Your gas “allies” in turn immediately set out to use this letter to fight zero-emissions.

In fact, we find some cognitive dissonance between the action of sending the August 3 letter and your claim that “[n]obody wants ZE trucks more than we do.” A leader in advancing zero-emissions would not have produced a letter that would be used by gas lobbyists to fight zero-emission technologies. The District’s gas truck advocacy also spills out beyond the South Coast

Air Basin. For example, your letter has been used as an argument for weakening the Port of San Diego's final Maritime Clean Air Strategy. The Port of San Diego has been working with community organizations on it for some time to focus on zero-emissions technology. Due to South Coast's letter, there is now a push for natural gas technologies, going directly against the community efforts.

And you should not mistake the gas industry's zeal in using your letter as evidence that they actually care about clean air. Their primary mission is to deliver profit to their shareholders. They have presented this letter on calls with shareholders and investors to help boost the value of their corporations. These companies do not share our primary goal of wanting to attain clean air standards and make our air safe to breathe. Do not provide fuel to their fire.

Request 3: Stop touting natural gas trucks without acknowledging their downsides.

The District's simplistic argument for pursuing natural gas trucks is that diesel trucks emit toxic pollutants and natural gas trucks are not diesels. But the fact is that the District does not have evidence on the composition of natural gas truck emissions, and has not assessed the risk these emissions will cause over the lifetime of these trucks. Soon after your letter dismissing studies on the ultrafine particles in natural gas emissions, the International Council on Clean Transportation released another analysis noting that natural gas trucks in the U.S. may emit up to 50 times more ultrafine particles as diesels as well as ammonia, all while NOx emission controls rapidly deteriorate.¹ Sweeping our concerns under the rug because it might conflict with your policy priority of advancing natural gas trucks is not appropriate for an agency that is focused on public health.

We also remind the District that it is not the responsibility of frontline residents and workers to prove that natural gas isn't a safe or healthy option. Throughout the State, environmental justice communities have fought back against natural gas refueling sites,² extraction and other natural gas uses because of the clear harm that is felt and observed when living in close proximity to the use of this fossil fuel. Our communities do not accept a "reduced harm" when there is a clear path to eliminating the harm from combustion.

In conclusion, we remind you that your job is to be responsive to the people, not industry advocates. Your approach claiming frontline groups do not understand the issues is a slap in the face to the many advocates who spend their lives tirelessly learning about air pollution problems, and advocating for zero-emission solutions for their communities. Your statements also fail to honor the hard work of the many environmental justice organizations that sent you the letter. In the end, there are not infinite resources to pay every polluter to clean up the mess they've made. Every time we invest precious taxpayer dollars in claimed "near-zero" emission technologies, we are making a choice to not invest that money in zero-emissions. We recognize the difficulty in transforming away from a combustion-based economy, but with our eyes wide open to the difficulties, this is what we are insisting we want for our communities. It is not for you to claim we're wrong in advocating for what our communities want to finally solve the air pollution crisis

¹ <https://theicct.org/sites/default/files/publications/low-nox-hdvs-compared-sept21.pdf>.

² <https://www.sbsun.com/2014/04/22/omnitrans-sbx-system-celebrated-amid-chants-from-protestors/>

created in our communities. Time is short, people are getting sick and dying, and we can ill afford to waste time on false solutions. We hope we can come together in the common mission of zero-emissions.

Sincerely,

Taylor Thomas
East Yard Communities for Environmental Justice

Jane Williams
California Communities Against Toxics

Faraz Rizvi
Center for Community Action and Environmental Justice

Yasmine Agelidis
Adrian Martinez
Earthjustice

Danny Serrano, AICP
Environmental Health Coalition

Anthony Victoria
Inland Congregations United for Change

Mike Muñoz
Los Angeles Alliance for a New Economy

Heather Kryczka
Natural Resources Defense Council

Andrea Vidaurre
People's Collective for Environmental Justice

Peter Warren
San Pedro & Peninsula Homeowners Coalition

Yassi Kavezade
Sierra Club

Theral Golden
West Long Beach Association

CC: Deborah Jordan, EPA Region IX
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