

October 25, 2024

To: Pedro Nava, Little Hoover Commission Chair  
Sent via email to: [pedronava@pedronava.com](mailto:pedronava@pedronava.com)

**Subject: Request for LHC to Create a Report on Air Quality Timelines and Compliance Solutions**

Dear Chairman Nava,

Executive Director Ethan Rarick joined us on October 15 and shared the reports on Retail Theft and CEQA reform. We're looking forward to hearing the completed report on Property Insurance and AI. We appreciate all of the work Mr. Rarick's staff and the commissioners have done to understand and provide thoughtful proposed solutions on a number of fraught and complicated issues of concern to Californians.

At this time, Inland Action would like to follow up on a concern raised at that meeting and formally request that the Little Hoover Commission consider creating a report on the timeline for requirements to reduce emissions from diesel engines currently being imposed by the California Air Resources Board (CARB) and the Southern California Air Quality Management District (SCAQMD). Current timelines propose punishments, some in the form of fines, some with consequences that have not yet been defined, that will be imposed on companies for lack of compliance, even if it is outside their own control.

At issue is not the goals of lowering emissions and moving towards alternative power sources for the region's robust logistics and transportation systems. The concern is the implementation of the above-mentioned plans for reasons outside of the control of the companies being held accountable. For example: Lack of available power to charge electric vehicles, shortage of electrical equipment or unavailable "yet to be designed" equipment, service and repair infrastructure for new electrical equipment to keep them in service, and lack of the substantial capital needed to replace diesel equipment. The timeline each organization has created is progressive, with different compliance requirements and dates over the next 15 years and beyond. The timelines, however, share a failure to consider whether compliance is even feasible.

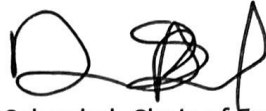
The example presented at the meeting was Stater Bros. Markets. Stater Bros. has already begun the process of introducing some types of electric vehicles at their large warehouse facility in the City of San Bernardino. They have done, and plan to continue doing, everything in their power to follow the published schedule of each agency. However, they will be unable to comply with both the CARB and SCAQMD compliance timelines because they are nearly at their maximum power usage on their site. Southern California Edison has informed Stater Bros. that without extensive upgrades to the existing power infrastructure, they will not be able to deliver sufficient power for Stater Bros. to implement future electrification needs. Without additional electrification, Stater Bros. Markets had to choose the best path for compliance, which means complying with SCAQMD. Unfortunately, this will mean noncompliance with CARB. This constraint is one of many outside the control of companies being asked to comply and is not unique to Stater Bros. Markets.

Our hope is that the Little Hoover Commission would be willing to investigate the current regulations and compliance deadlines, as well as the feasibility of compliance on the part of the affected businesses and make recommendations for reasonable solutions.

Sincerely,



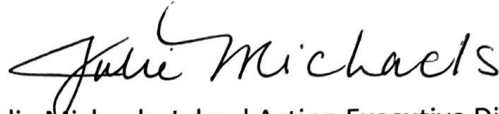
Kevin Dyerly, Inland Action Chair



Dan Schenkel, Chair of Economic Development



Pete Van Helden, CEO of Stater Bros.



Julie Michaels, Inland Action Executive Director

Cc:

Ethan Rarick, Executive Director

Bill Emmerson, Former Little Hoover Commissioner