

April 21, 2014

Mary Nichols, Chairman and Members of the Board
California Air Resources Board
1001 "P" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Chairman Nichols and Members of the Board:

The undersigned organizations urge you to continue California's progress in reducing harmful diesel pollution by maintaining a strong and health-protective Truck and Bus Regulation. Diesel trucks are the largest source of diesel pollution in California contributing to poor regional air quality and increased localized health risks. Accelerating the adoption of modern emissions controls and eliminating use of the oldest, highest-polluting trucks is critical to meeting California clean air and public health goals.

Numerous studies have documented a range of adverse health impacts from long-term exposure to diesel pollution, including increased risk for respiratory and cardiovascular illnesses, such as asthma, heart attacks and lung cancer, stunted lung growth in children, adverse birth outcomes, more frequent emergency room visits, and higher mortality rates. Children, people who live near highways, ports, and other freight centers, and residents of the San Joaquin Valley suffer approximately twice the asthma rate as the general population. Successfully implementing the Truck and Bus regulation will avoid an estimated 3,500 premature deaths in California and create an estimated \$48 billion to \$68 billion in economic benefits from decreased health costs due to reduced illnesses, hospital admissions and premature deaths, and increased worker productivity because of less lost work days—nine times more than the cost of the rule.

California's efforts to reduce diesel emissions are working. Between 2007 and 2010, a 50 percent reduction in black carbon and NOx was measured in the Los Angeles/Long Beach region. Similar levels of reductions also were found in an Oakland study between 2009 and 2010. These reductions are the result of investments in emission control retrofits and cleaner trucks ¹ By the end of 2014, ARB staff estimates that 2,700 tons of particulate matter will be reduced as a result of the Truck and Bus regulation ² We encourage board members to recognize that these improvements are the result of significant investments by truck owners as well as state incentive programs. In addition, the regulation has supported manufacturing, installation and maintenance jobs in the emission controls industry.

Despite this significant progress, there are still thousands of older trucks operating in California that need to be cleaned up in order meet regional air quality standards and reduce local health risks. As such, we strongly urge the board to limit any changes to the Truck and Bus regulation in order to maintain the health benefits of the standards and ensure that existing clean truck investments by California companies are not undermined.

This regulation is vitally important to cleaning up California's air and protecting public health. CARB must continue its efforts to ensure that the rule is successfully implemented and that the health benefits are achieved. Thank you for considering our comments.

¹ As of October 2013, ARB report nearly 140,000 trucks as in compliance with PM requirements.

² <http://www.arb.ca.gov/board/books/2013/102413/13-9-5pres.pdf>

Sincerely,

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Union of Concerned Scientists

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Greenaction for Health and Environmental Justice

Luis Ayala
Los Angeles County Medical Association

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Natural Resources Defense Council

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