

**Subject:** Additional CC scoping plan submittal-- Attn: Robert Du Vall  
**From:** Rajiv Bhatia <Rajiv.Bhatia@sfdph.org>  
**Date:** Tue, 16 Oct 2007 13:45:53 -0700  
**To:** ccplan@arb.ca.gov

Robert--

Thanks for offering to include my comment. I formatted my comment in the attached attachment.

(See attached file: CARB CC Highway Speed Strategies.doc)

The original email is below.

--Rajiv

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Rajiv Bhatia, MD, MPH.  
Director, Occupational & Environmental Health,  
San Francisco Department of Public Health  
Assistant Clinical Professor of Medicine, UCSF  
1390 Market Street, Suite 822  
San Francisco, CA 94102  
415-252-3982 (tel) 252-3818 (fax)  
[rajiv.bhatia@sfdph.org](mailto:rajiv.bhatia@sfdph.org)  
[www.sfdph.org/eh](http://www.sfdph.org/eh)  
[www.sfdph.org/phes](http://www.sfdph.org/phes)

"In a time of universal deceit, telling the truth is a revolutionary act."  
--George Orwell

----- Forwarded by Rajiv Bhatia/DPH/SFGOV on 10/16/2007 01:07 PM -----

owner-ccea2@lists  
erv.arb.ca.gov

09/24/2007 02:40  
PM

[rajiv.bhatia@sfdph.org](mailto:rajiv.bhatia@sfdph.org)

To

cc

Subject  
Re: Board Comment Submittal for  
ccea2: Highway Speed Limited  
Reductions Can Immediately Reduce  
Carbon Emmissions

Thank you for taking the time to send the Air Resources Board (ARB or Board) your views concerning an issue scheduled for ARB action.

If your comment concerned a regulatory item, you will receive notice of additional public comment periods, if any, on that item. However, this notice will be exclusively via email unless you

provide me with a physical address to which you would like a hard copy of the notice to be mailed.

A summary of Board actions on public hearing items and hearing transcripts are available at our web site, <http://www.arb.ca.gov/board/board.htm> .

In addition, updates on specific regulatory items are available through <http://www.arb.ca.gov/html/lawsregs.htm> .

These and other sites potentially relevant to your comment are available at the ARB's homepage, <http://www.arb.ca.gov/> .

Thanks again for your input.

Sincerely,

/s/  
Clerk of the Board  
California Air Resources Board

----- Your comment follows -----

Comment 47 for ccea2 (Non-Reg).

CONTACT INFORMATION:

First Name: Rajiv

Last Name: Bhatia

Email: [rajiv.bhatia@sfdph.org](mailto:rajiv.bhatia@sfdph.org)

Phone:

Affiliation: San Francisco Department of Public Health

File (i.e., Attachment):

Subject: Highway Speed Limited Reductions Can Immediately Reduce Carbon Emmissions

Comment:

Please adopt Highway Speed Limit Reductions to 55 MPH as an extremely cost effective early implementation strategy based on the evaluation below against the published ARB Early Implementation Strategy Criteria.

1. Whether the strategy can be adopted by ARB in calendar year 2009 or earlier: YES

2. Whether the strategy can be legally effective by January 1, 2010: YES, Highway Speed are set by State Legislature in VEHICLE CODE SECTION 22348-22366

3. Whether the strategy relies on readily available mature technologies or options that have already been successfully demonstrated at an acceptable cost: YES, REDUCING SPEED LIMITS WAS DEMONSTRATED IN 1977 IN RESPONSE TO A WORLD OIL PRICE SHOCK; REDUCING LIMITS WOULD REQUIRE AN AMMENDMENT TO STATE LAW, REVISION OF SPEED LIMITS SIGNS; DRIVER EDUCATION; AND ENFORCEMENT

4. Whether the potential lifecycle GHG emission reductions are of sufficient magnitude to warrant the resources required to adopt and implement a regulation: YES; SPEED LIMIT REDUCTIONS ARE HIGHLY COST EFFECTIVE; ACCORDING TO FEDERAL DATA ON SPEED AND FUEL ECONOMY RESERACHED AND PUBLISHED BY OAK RIDGE NATIONAL LABORATORIES, (<http://www-cta.ornl.gov/data/index.shtml>)A REDUCTION IN SPEED FROM 70 TO 55 RESULTS IN AN AVERAGE 17% IMPROVEMENT IN FUEL ECONOMY IN TERMS OF MILES PER GALLON; POTENTIALLY THIS TRANSLATES INTO BILLIONS OF GALLONS OF FUEL SAVED AND TENS OF BILLIONS OF TONS OF CARBON DIOXIDE EMMISIONS PREVENTED

5. Whether the strategy can be developed and implemented with available resources. YES

6. The potential for adverse impacts on criteria or toxic emissions: HIGHWAY SPEED LIMIT REDUCTIONS WOULD REDUCE CRITERIA AIR POLLUTANT EMISSIONS

7. The potential for disproportionate impacts on low-income communities or other disadvantaged sectors: WILL HAVE BENEFITS TO LOW INCOME COMMUNITIES DISPROPORTIONATELY IMPACTED BY AIR POLLUTANTS; COSTS TO LOW INCOME COMMUNITIES WILL BE LESS BECAUSE OF REDUCED VEHICLE OWNERSHIP AND DRIVING BEHAVIOR AMONG THIS ECONOMIC GROUP

8. The potential for disproportionate impacts on small businesses: UNKNOWN

9. Significant loss of benefits due to leakage: NO

10. Coordination opportunities with related actions that may have been taken or are planned by other entities including local agencies, the U.S. EPA, and international agencies such as the European Commission. INCORPORATED INTO EU POLICY AGENDA; CAN BE REPLICATED IN OTHER STATES

Thank you

Rajiv Bhatia,MD,MPH  
Director, Environmental Health  
San Francisco California

**CARB CC Highway Speed Strategies.doc**

**Content-Type:** application/msword  
**Content-Encoding:** base64