July 9, 2021

Liane M. Randolph  
Chair  
California Air Resources Board  
1001 I Street,  
Sacramento, CA 95814

Chair Liane M. Randolph,

Environmental Health Coalition (EHC) is a 41-year-old San Diego/Tijuana based non-profit social and environmental justice organization dedicated to empowering people, organizing communities, and achieving justice for low-income communities of color.

Environmental Health Coalition recommends that CARB prioritize direct emission reductions in the transportation sector as part of the CARB Scoping Plan 2022 to achieve a 100% zero-emission transportation system in California within the next decade.

Residents living in EJ Communities are suffering the worst impacts from climate change and climate warming air pollution, such as diesel particulate matter, which causes global warming along with significant health issues such as asthma, heart and lung disease or premature death. Diesel PM and PM 2.5 contain black carbon, which has a warming effect that is up to 1,500 times more powerful than carbon dioxide per unit of mass and are not yet regulated by most climate policies. If CARB ignores these dangerous super pollutants, it will fail to achieve GHG reduction goals set by AB 32 to prevent the worst impacts from climate change.

CARB must consider the social costs of the emissions of greenhouse gases, and prioritize emission reduction rules and regulations that result in direct emission reductions at large stationary sources of greenhouse gas emissions sources and direct emission reductions from mobile sources.

We need investments in decarbonized infrastructure and policies that prioritize EJ Communities living on the frontlines of the climate crisis. Environmental Health Coalition requests the following be included in the Scoping Plan update:

- Eliminate all sources of air pollution that contribute to climate change, focusing on diesel particulate matter (PM), particulate matter (PM) 2.5 and ozone
• Prioritize investments in zero-emission vehicles (ZEV) with associated charging infrastructure to electrify and improve mass transit in EJ Communities first and reduce our dependence on single-occupancy automobiles

• Require all medium-duty and heavy-duty trucks be zero-emission vehicles (ZEV) to eliminate diesel particulate matter (PM) from freight in EJ Communities

• Incorporate the work of the AB 617 steering committees on Community Emissions Reduction Plans (CERPs) from across California that were developed using a community participatory process

CARB must stand with Environmental Justice communities across California in pursuing a 100% zero-emission transportation sector in the 2022 Scoping Plan update. Our communities need CARB to invest in solutions that will clean the air and electrify the public transportation and freight systems in urban centers like San Diego and across the state. Our communities cannot continue to suffer disproportionate impacts from climate damaging air pollution.

In order to achieve Climate Justice, CARB must prioritize direct emission reductions in the transportation sector as part of the 2022 Scoping Plan.

Regards,

Kyle Heiskala
Climate Justice Policy Advocate
Environmental Health Coalition

cc: Richard Corey, CARB Executive Officer - richard.corey@arb.ca.gov
Chanell Fletcher, Deputy Executive Officer – Environmental Justice - chanell.fletcher@arb.ca.gov