



March 4, 2022

Ariel Fideldy, Manager
Austin Hicks, Air Pollution Specialist
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Comments on 2022 State Implementation Plan

Dear Ms. Fideldy and Mr. Hicks:

On behalf of the American Lung Association, we are writing to comment on the California Air Resources Board's (CARB) development of the 2022 State Implementation Plan (2022 SIP). The 2022 SIP represents a critical opportunity to build on past successes and elevate new strategies to reduce the health consequences of poor air quality in California and we appreciate the opportunity to engage in workshops and the Board hearing held to this point in the development.

We support the overall approach to the draft 2022 SIP that focuses on efforts to accelerate the transition to on- and off-road zero-emission technologies, eliminate the impacts of legacy combustion fleets, and ensure meaningful transitions to alternative transportation modes to protect and improve health. The draft 2022 SIP provides several strong elements that will advance these goals. This is especially important in communities most heavily impacted today by poor air quality and associated health burdens. Further, we appreciate that the draft 2022 SIP was informed by robust public input, including recommendations supported by the Lung Association. Below, we offer brief comments on several measures included in the draft 2022 SIP:

Truck Retirement/Zero Emission Trucks Measure:

The truck retirement measure put forward by clean air, health and medical organizations would ensure that the 2022 SIP directly addresses the health and equity burdens posed by legacy diesel truck fleets. Several CARB board members voiced their strong support for a measure to require truck retirement at useful life during the October 2021 board hearing, and echoed this support during the February 24, 2022 informational hearing on the 2022 SIP. We believe that a useful life retirement measure could be one of the most health protective SIP measures taken by the board in the coming years, and that:

- CARB should utilize existing authority as the basis for developing and implementing a useful life retirement regulation within the parameters established by Senate Bill 1 (Beall, 2017).
 - We look forward to working with the staff to evaluate new authorities (*e.g.*, fee schedules, indirect source rules, etc.) to develop this rule, but these should be viewed as additional to CARB's existing authority to enact this measure, not as a condition for adopting a strong rule in the near-term.
- The retirement provision should be a priority Board action following the adoption of the 2022 SIP and must be in effect in 2028, when model year 2010 trucks reach 18 years of age to ensure the turnover calendar applies to the oldest trucks on the road at that time.

We also support the ongoing effort to develop the Advanced Clean Fleets and ACC rules and believe that each rule must be as strong as possible in the early years to accelerate the complete transition to zero-emission sales of cars and trucks to ensure attainment beyond the pathways illustrated in the 2020 Mobile Source Strategy. As noted in the draft 2022 SIP, combustion truck emission levels are often exceed certification levels, lending greater urgency to both the transition to zero-emissions and the retirement of the oldest vehicles.

Measures to Support Sustainable Communities/Vehicle Miles Traveled:

We support the inclusion of the enhanced regional measures category in the 2022 SIP. Given the lack of progress toward realizing the many benefits expected under Senate Bill 375 Sustainable Communities Strategies, clear measures to reduce emissions via land use and transportation programs that reduce VMT must be in the SIP. We look forward to working with the board on these measures under the enhanced regional measures category.

Locomotive Measures:

We view the proposals to enact new locomotive programs as crucial to protecting health and addressing environmental justice. We support the proposed frameworks for idling reduction, in-use emission standards and investment in zero-emission technology acceleration. These policies are long overdue and will provide meaningful, near-term health benefits in highly impacted communities.

Federal Measures:

Given the outsized role that reductions from federal sources have on achieving attainment, we appreciate the ongoing engagement by CARB and local air districts with federal clean air partners. We are eagerly anticipating the federal rulemaking as a complement to California's Low NOx Omnibus standard and believe that it must match the stringency, durability and warranty requirements of the California policies to best protect the health of the public.

Additional Measures:

In addition to those items noted above, we look forward to working with the Board on the all-electric appliance standards as well as the consumer product policies outlined in the draft. We encourage the staff's ongoing review of additional public measures for inclusion in the 2022 SIP. Finally, we support increased attention to reducing emissions from the marine sector, including through the completion of the Commercial Harbor Craft regulation and revisiting the Ocean Going Vessels at Berth regulation to address these harmful sources of pollution in portside communities.

We look forward to continued engagement with the staff and board on this process – as well as with your public health partners at the air districts and US EPA to achieve clean air for all Californians.

Sincerely,

Will Barrett
National Senior Director, Clean Air Advocacy

Mariela Ruacho
California Manager, Clean Air Advocacy