

Chair Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA  
95819

### Support for California Phase 2 GHG Standards

Dear Chair Nichols and Members of the Board:

On behalf of the American Lung Association in California, I am writing to express our support for the adoption of the Phase 2 GHG Standards for trucks by the California Air Resources Board. Our organization recognizes the significant public health, air quality and climate change benefits to be gained by strong actions and we support moving this effort forward.

California is home to the most difficult air pollution challenges in the United States, and faces increasing health and economic risks due to climate change. The goods movement sector is a key contributor to lung health impacts, estimated to cause thousands of deaths and hospitalizations due to respiratory health impacts, costing tens of billions of dollars annually in California.<sup>1</sup> The extreme droughts, heat events and wildfires that have affected Californians over the past few years are a clear indication that we must press forward with strong, clear actions to curb climate pollution to protect public health.

**Significant Climate and Petroleum Reduction Benefits:** The Phase 2 proposal provides assurances that the heavy duty transportation sector will continue to ratchet down on harmful pollutants and advance progress on reducing petroleum usage in the State. The avoidance of burning billions of gallons of diesel and the expected reduction of over 200 Million Metric Tons of carbon pollution by 2050 are key components of advancing a healthy future for California.

**Ensuring California-Specific Compliance and Enforcement:** The American Lung Association appreciates that the California Phase 2 proposal would ensure certification verification and enforcement by CARB to ensure compliance with the California rules. By maintaining strong, state-specific documentation, verification and enforcement, the proposal increases likelihood that clean air and climate benefits are truly experienced by all Californians.

**Protecting Against High-Polluting Glider Kits:** The American Lung Association strongly supports CARB's proposal to align the California Phase 2 rule with the US EPA's previously adopted (2016) regulation of Glider Kits, and is strongly opposed to ill-advised federal proposals to weaken these

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<sup>1</sup> California Air Resources Board. Sustainable Freight Discussion Document: Pathways to Zero and Near-Zero Emissions. 2015. <https://www.arb.ca.gov/gmp/sfti/sustainable-freight-pathways-to-zero-and-near-zero-emissions-discussion-document.pdf>

rules.<sup>2</sup> The alignment with existing federal Glider Kit rules under the California Phase 2 proposal offer vital protections to California residents and illustrate the harmful outcomes of the federal government's actions to reverse course on this vital clean air program. These vehicles can produce as much as 450 times the particle pollution of certified, modern engines – posing the potential for a major step backwards in California's clean air policies.<sup>3</sup> In January of this year, one dozen leading public health organizations submitted comments urging US EPA to retain the existing federal glider truck rules on the basis of lethal public health outcomes of allowing these vehicles to operate.<sup>4</sup> Similarly, the DERA Coalition, consisting of vehicle manufacturers, air districts, environmental and public health organizations submitted similar comments opposing the rollback of the glider provisions of the Phase 2 rules.<sup>5</sup> California's action to preserve this critical protection is vital to public health while the federal government backtracks on this clean air effort.

**Advancing Zero Emission Technologies:** The Lung Association is supportive of CARB's efforts to encourage the transition to zero emission vehicles across the transportation sector. Through strong incentives and regulatory requirements for meaningful integration of zero emission technologies as outlined in this proposal, the California heavy duty vehicle sector must quickly transition to battery-electric and hydrogen fuel cell electric options in every possible vehicle category. This transition across the sector will provide vital reductions in harmful emissions from the fossil fuel combustion technologies and spur a cleaner air future.

In closing, we strongly encourage the California Air Resources Board to adopt the proposed California Phase 2 rules to protect the public's health, our air and our environment.

Sincerely,

Will Barrett  
Senior Policy Analyst

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<sup>2</sup> American Lung Association. Letter to US EPA Administrator. January 5, 2018. "We write in strong opposition to the Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits. We urge you to withdraw this ill-advised proposal and maintain the Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2 rule." <http://www.lung.org/assets/documents/advocacy-archive/comments-re-proposed-repeal.pdf>

<sup>3</sup> U.S. EPA. 2017. Chassis Dynamometer Testing of Two Recent Model Year Heavy-Duty On-Highway Diesel Glider Vehicles. p. 3 <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-2417>

<sup>4</sup> American Lung Association, et al. Letter to US EPA Administrator. January 5, 2018.

<sup>5</sup> DERA Coalition. January 2018. <http://www.lung.org/assets/documents/advocacy-archive/dera-coalition-comments-re.pdf>