



September 22, 2022

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

Comments on 2022 State Implementation Plan

Dear Chair Randolph and Board Members:

On behalf of the undersigned health and medical organizations, we are writing to share our appreciation for the work to develop the 2022 State Implementation Plan and to offer our comments. The proposed SIP contains many important policies designed to support attainment of ozone standards, but will also provide major local health protections to California's most impacted communities. We offer the following comments on the proposed SIP and encourage the Board to adopt and implement the strongest possible standards.

Truck Retirement / Zero Emission Truck Rule

We greatly appreciate that the proposed 2022 SIP included the truck useful life retirement proposal recommended by health and clean air advocacy organizations. This policy is included in the proposed SIP and projected to deliver significant reductions (14.9 tons per day) in smog-forming emissions. We believe that a higher priority should be placed on this policy and that the approved SIP should ensure that the rulemaking is in place by 2028.

CARB must ensure proper tracking of the development of additional authorities to retire vehicles at full useful life defined by Senate Bill 1 (2017, Beall). To ensure that model year 2010 trucks with 800,000 miles are retired no later than 18 years after certification, CARB must update the timeline for the SIP proposal such that:

1. By December 31, 2024, CARB staff must provide a board report on whether new tools illustrated under Option A (“New Authority”) have been secured (*e.g.*, CARB-sponsored legislation). If no successful new authority has been secured by December 2024, then CARB will pursue the Option B (“Existing Authority”) rulemaking to require retirement of combustion vehicles at useful life.
 - a. In either case, CARB will launch the rulemaking in Quarter 1 of 2025 using existing or newly secured authority.
2. CARB’s final hearing on the Zero Emission Truck/Retirement policy must occur by December 31, 2026.
3. Implementation and enforcement of the measure must begin by January 1, 2028 to ensure Model Year 2010 trucks reaching 800,000 miles are retired. 2028 would mark the most lenient bounds of Senate Bill 1.

Locomotives

We support the inclusion of the locomotive measures as a critical opportunity to protect health and reduce disparities in pollution burdens communities. Locomotives are large contributors of nitrogen oxides and particle pollution in California and this measure will generate the largest single source of NOx reductions (63.2 tons per day in 2037) in the SIP.

CARB must remain focused on all classes of locomotives (Class 1, Passenger and Industrial) and support the critical transition to zero-emission technologies. This measure is vital to reducing NOx emissions and addressing carcinogenic diesel exposure risk in rail-impacted communities. We support the three current concepts included in the State Implementation Plan (SIP) to achieve those goals:

1. Setting Idling Limits to reduce impacts on regional air quality and the health of neighboring communities.
2. In-Use Operational Requirements to gradually reduce the use of the oldest locomotives while also phasing in zero-emission standards for Line Haul, Passenger, Industrial and Switch locomotives.
3. Establishment of a Spending Account based on emissions from active locomotives to assist in the transition to cleaner and zero-emission technologies.

Regional Emissions Budgets and Enhanced Transportation Choices

We support that the Draft SIP recognizes that ongoing growth in vehicle miles traveled (VMT) counteracts the benefits of many of CARB’s important vehicle fuel and technology policies. While disappointed with the lack of quantified emission reductions associated with the ongoing policy efforts outlined in the draft SIP and other CARB efforts, we support the goals of those efforts and are encouraged that these are included in the plan. We look to CARB to continue to work with relevant agencies to ensure alignment of transportation choices, policies and investments with achieving our clean air standards.

Additional Policy Areas

We look forward to working with the board on the development of other measures to address major sources of ozone-forming emissions including consumer products, zero-emission appliance standards

and federal policy actions related to ensuring success in meeting health-protective standards in California.

We look forward to ongoing dialogue with the CARB board and staff on the adoption and implementation of the measures included in the 2022 SIP. Please contact William.Barrett@Lung.org for any additional information or questions.

Sincerely,

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