



November 21, 2019

To: Lea Yamashita  
Cari Anderson  
Freight@arb.ca.gov

*Transmitted via e-mail*

**Re: Comments on Preliminary Health Analysis Emissions Inventory for the California Air Resources Board's Transportation Refrigeration Units**

Dear Ms. Yamashita and Ms. Anderson:

On behalf of the undersigned organizations, we respectfully submit the following comments in response to the California Air Resources Board (ARB)'s preliminary health analysis and emissions inventory for Transportation Refrigeration Units (TRU). The benefits of this regulation are staggering. Hundreds of lives will be saved by this regulation, which in addition to other health benefits, is estimated to be approximately \$4 billion dollars in health savings for California. In particular, both documents produced to support this regulatory proposal provide a deep need to move as quickly as possible to adopt this regulation. The following sections offer some suggestions on moving forward with this rule.

*Health Analysis*

The health benefits of this rule are so great that we respectfully request that the ARB move quicker to adopt updated regulations on TRUs. The data regarding clustering of these facilities, particularly around communities, is staggering and provides important information about the harm these facilities have on human health. The information provides an important snapshot into the negatives of these facilities and large health benefits of moving to cleaner TRUs as soon as possible.

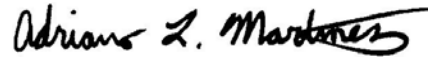
*Emissions Inventory*

The data within the emissions inventory is immensely helpful to understand the importance of this regulation concept to fight harmful NOx emissions and fine particulate matter. We appreciate the helpful charts and figures on pages 39 and 40. In the upcoming draft of this document, it would be helpful to have the raw NOx emissions reductions for each category, in addition to the NOx emissions reductions expected for the various air basins in California. From what we can tell, this rule will have a large benefit to battling harmful smog pollution in places

like the South Coast Air Basin and the San Joaquin Valley, so it will be good to have more specific data on those benefits.

Our organizations look forward to working together to create a safer, healthier environment for all communities across California. Given the current large amount of harms TRUs impose on Californians and the large health benefits projected, we encourage the ARB to move up the schedule to complete this regulation.

Sincerely,

A handwritten signature in black ink that reads "Adrian L. Martinez". The signature is written in a cursive style with a horizontal line underlining the name.

**Earthjustice**

Adrian Martinez, Staff Attorney

Yasmine Agelidis, Associate Attorney