



November 21, 2019

Cari Anderson and Lea Yamashita
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Support for Transportation Refrigeration Unit Proposal

Dear Ms. Anderson and Ms. Yamashita:

Thank you for the opportunity to provide additional comments following the October 31, 2019 workshop on Transportation Refrigeration Unit emissions inventory and health analysis. As noted in the workshop, the urgency of addressing the emissions and health burdens caused by TRU operations at the neighborhood level is clear and we applaud the California Air Resources Board for placing high priority on alleviating this burden.

Our comments following the discussion are laid out below and reflect the letter submitted by our organizations in October. We support a stronger, more health-protective rule and believe that the foundational work staff is undertaking on the emissions inventory and health analysis are critically important to securing the maximum feasibly community air protection benefits. As noted at the workshop, staff have carefully tracked the shift in the market to smaller, cheaper, dirtier engines, and the vast majority of out-of-state engines being in this higher-polluting category.

- ***We appreciate the work to update emissions inventory*** and take into account greater emissions from out-of-state trailer TRUs and the growth in lower horsepower engines.
 - Higher sales of lower horsepower TRUs means more pollution impacts on local communities that must be addressed through stronger controls. As noted in the workshop, these lower horsepower trailer TRUs produce significantly more pollution:
 - 15 times the particle pollution
 - 1.5 times the NOx emissions compared with the 25-50 horsepower engines.
 - The inventory must account for higher levels of out-of-state TRU units with higher levels of lower horsepower engines. As discussed at the workshop, the majority of out-of-state TRUs are lower horsepower and more polluting and this must be taken into account as the stringency of the rule is designed.
- ***Continue to pursue real-world emissions data as rule is developed.*** As discussed in the workshop, more information is needed from engine research and testing to accurately estimate TRU performance over time. We encourage CARB to continue this research and bring the findings forward into the rulemaking to ensure the greatest health protections.

- ***Pursue a tighter limit on idling to reduce health burdens.*** As noted in our previous comment letter and in the workshop, lower allowable idling times would reduce the health burdens on local communities. The health analysis is based on the 15 minute idling proposal concept, and still shows negative health consequences even at the longer distance distances from the TRU operation sites.

In closing, we support the direction of the proposal discussed in the workshops to achieve full phase in to zero emissions truck TRUs starting in 2025, and to update the inventory to reflect the changing technologies and market movements. Given the health risks posed to local communities today, we encourage the ongoing dialogue to evaluate opportunities to increase the benefits of the proposal through greater attention to trailer TRUs and reducing the allowable idling time.

We look forward to working with staff and stakeholders to achieve the greatest possible health protections possible under this rule.

Sincerely,

Will Barrett
American Lung Association in California

Kevin Hamilton
Central California Asthma Collaborative

Bill Magavern
Coalition for Clean Air