



December 10th, 2020

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Mobile Source Strategy Workshop Draft

Dear Chair Nichols,

On behalf of the undersigned health and medical organizations, we are writing to provide comments on the Draft 2020 Mobile Source Strategy (MSS). We look forward to the ongoing discussion with California Air Resources Board members and staff to update and implement a robust plan to ensure all Californians have access to clean, healthy air and a safe environment. The MSS provides a pathway to accelerate clean air progress and we appreciate the opportunity to comment.

Largely due to the transportation sector, Californians face the most difficult air pollution challenges in the United States. California is home to seven of the ten most ozone-polluted cities in the United States, and six of the ten most particle-polluted cities according to the American Lung Association's *State of the Air* 2020 report.¹ The transportation sector accounts for approximately 80 percent of ozone- and particle-forming NO_x emissions and roughly half of the state's climate-forcing greenhouse gas emissions. The impacts of ozone and particle pollution include asthma attacks, heart attacks, strokes and a range of other respiratory and cardiovascular impacts. Particle pollution also contributes to lung cancer and is responsible for over 5,000 deaths per year in California.² These burdens are felt most acutely by people living with lung and heart conditions, children, seniors and lower-income communities and communities of color. Climate change impacts such as extreme heat, drought, wildfires and other effects worsen air quality and add a wide range of public health burdens and disparities. Reducing transportation pollution in line

¹ American Lung Association. *State of the Air* 2020. www.lung.org/sota

² California Air Resources Board. *Mobile Source Strategy 2020 Workshop Draft*. September 2020. p. 15. https://ww2.arb.ca.gov/sites/default/files/2020-11/Draft_2020_Mobile_Source_Strategy.pdf

with levels needed to achieve clean air and climate standards is vital to improving and protecting public health for all Californians.

General Comments

The continued multi-pollutant approach laid out in the draft MSS is critical to ensuring California is efficient in meeting both its air quality and climate standards. The MSS discussion before the Board is especially timely within the range of various transportation planning processes underway across the state, including implementation of Governor Newsom's Executive Order N-79-20, CalTrans' California Transportation Plan 2050, CalSTA's implementation of Governor Newsom's Executive Order N-19-19 and others that are running alongside CARB's suite of mobile source regulations. Clearly, the need is great to clean up transportation pollution in pursuit of air quality, climate, public health, equity and mobility goals.

We encourage CARB to continue to work toward a comprehensive plan to address harmful pollution from all mobile sources. Key to this will be the continued coordination with our air districts and with the federal government to identify, develop and implement strategies to achieve our near- and long-term clean air and climate standards. As noted in the health coalition letter commenting in support of the Low NOx Omnibus rule, we believe "the 2020 Mobile Source Strategy should clearly illustrate a comprehensive pathway toward achieving clean air and climate standards..."³

Vehicle Miles Traveled

The focus on reducing Vehicle Miles Traveled (VMT) in the MSS emphasizes that California continues to fall short of our goals for building healthy, sustainable and equitable communities and that we simply cannot achieve our clean air and climate standards through technology alone. The MSS correctly notes that "[a]ctive transportation and public transit will not only contribute to a reduction in fossil fuel burning vehicles, but also will improve various health outcomes such as mental illness, cardiovascular diseases, and cancer."⁴ Implementing active transportation, in addition to the state's efforts to transition to ZEVs, will have an immense public health benefit for Californians. According to the California Department of Public Health's (CDPH) Healthy Mobility Option Tool/ITHIM model, CARB's Scoping Plan (2030) Scenario could reduce over 11,000 chronic disease deaths annually and up to \$108 billion in public health benefits.⁵

The continued collaboration between CARB and its sister agencies, local governments and regional planning agencies is critical to sharing best practices, thorough data analysis and building health and equity into the fabric of land use and transportation planning efforts. The themes laid out in the MSS, coupled with shifting direction by state transportation agencies toward aligning transportation investments with achieving California's climate standards⁶ through projects that reduce vehicle miles travelled, provide a strong foundation for more efficient transportation, land use and mobility systems that serve the needs and health of all California communities.

Vehicles and Fuels

³ American Lung Association et al. Comment letter on Low NOx Omnibus rule. August 2020.

https://www.lung.org/getmedia/2dc81c65-a83b-40ae-9f08-f2d6ac87d774/health-groups-low-nox-letter-8-20-20_final.pdf

⁴ California Air Resources Board. Mobile Source Strategy 2020 Workshop Draft. November 2020. p. 32.

https://ww2.arb.ca.gov/sites/default/files/2020-11/Draft_2020_Mobile_Source_Strategy.pdf

⁵ California Department of Public Health. Integrated Transport and Health Impact Model. 2020

<https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/#RunITHIM>

⁶ Governor Gavin Newsom. Executive Order N-19-19. September 2019.

We support the direction to achieve near- and long-term reductions in criteria and climate pollutants through requirements for cleaner technologies and the transition to zero emission technologies across the transportation sector. The recent *Road to Clean Air* report by the American Lung Association found that the transition to zero emission cars, buses and trucks over the coming decades could lead to over \$22 billion in public health benefits annually in California, including over 1,900 premature deaths avoided; 26,000 asthma attacks avoided; and 122,000 lost work days avoided on an annual basis due to pollution reductions in the year 2050 alone.⁷ We support the ongoing transition to widespread transportation electrification as well as CARB's commitment to requiring cleaner combustion technologies. Key strategies for achieving healthy air and climate will require significant attention in all categories:

Light Duty Vehicles

- Enact zero emission technology standards that achieve Governor Newsom's Executive Order N-79-20 for 100 percent sales of new zero emission vehicles in California by 2035, along with additional acceleration of the medium- and heavy-duty vehicles, with full transition to a zero emission drayage fleet by 2035.
- Set Advanced Clean Car Standards that include more stringent controls on the passenger vehicle combustion fleet, in terms of criteria pollutants and greenhouse gases.
 - Twenty health and medical organizations recently issued a letter outlining our recommendations for the ACC II program, calling for greater focus on achievement of real-world emissions benefits through more stringent standards and elimination of program flexibilities that lead to greater pollution burdens.⁸
- Enact a strong Clean Miles Standard to reduce emissions, increase zero emission technologies and reduce vehicle miles traveled in the ride-hailing sector.

Medium- and Heavy-Duty Trucks

- Implement Advanced Clean Trucks Standards as scheduled and adopt a strong Advanced Clean Fleet Standards to accelerate the Governor's Executive Orders' goals for zero emission medium and heavy-duty vehicles, including for a fully zero emission drayage truck fleet by 2035
 - Over 20 public health organizations wrote a letter to CARB in May 2020⁹ in support of these efforts and emphasized the public health benefits and reduction in harmful pollutants with the proposed Advance Clean Trucks Standards.
- Accelerate the full, statewide, implementation schedule for the comprehensive Heavy Duty Inspection and Maintenance "Truck Smog Check" Program established under Senate Bill 210 (Leyva, 2019).
- Develop and implement fleet turnover requirements within the diesel truck restrictions imposed by Senate Bill 1 (Beall, 2017).

Off-Road Vehicles and Equipment

- Maintain progress or accelerate timelines for adoption and implementation of zero emission Transportation Refrigeration Units, Commercial Harbor Craft and other off-road mobile sources under CARB jurisdiction.

⁷ American Lung Association. Road to Clean Air. September 2020. www.lung.org/ev

⁸ Health Coalition comment letter on Advanced Clean Cars II Workshop. October 2020. https://www.lung.org/getmedia/b07ffa2b-9fdf-4992-9308-97f3a5f0455e/Health-Coalition-Comments-on-ACCII_10-16-20.pdf

⁹ American Lung Association et al. Comment letter on [the Adoption of Advanced Clean Trucks Policy](#). May 2020. https://www.lung.org/getmedia/c7e21a67-cc1d-4bce-b370-7b6dfdba4d9d/health-orgs-act-final-letter_sign-on-5-26-20.pdf

- Accelerate the Small Off-Road Equipment (SORE) requirements for zero emission equipment to 2023.¹⁰ As noted in the MSS, “smog-forming emissions from SORE exceeded the emissions from passenger cars in California in 2018.”

Fuel Requirements

- Strengthening the 2030 carbon intensity requirements¹¹ under the Low Carbon Fuel Standard, and extend the standard beyond 2030 to further clean up combustion fuels.

Enforcement to ensure real-world benefits

- Ramping up enforcement of existing standards to ensure real-world benefits of established and planned standards, including targeted enforcement in highly impacted communities.

Incentive Funding

Across many of the planning processes underway across the state, we note the challenge of funding available to accelerate emission reductions to protect public health. Within the MSS process, we remain concerned that incentive funding for accelerated fleet turnover, consumer incentives, equity-based funding programs, AB 617 program implementation and others are subject to significant shifts from year to year. Even in higher funding years, available funding is often far short of demand, as noted in the MSS:

*Despite the substantial incentive allocations over the last few years, funding has not yet reached the levels needed to meet our near-term goals; due to California’s current budget crisis resulting from the COVID-19 pandemic, it is likely that less funding will be allocated to these programs in the immediate future.*¹²

Given the uncertainty of funding, we again note the importance of CARB accelerating and strengthening both planned and existing rules. We request that CARB ensure emission reductions are targeted to California’s most heavily and disproportionately impacted communities, through equity-based incentive programs, and through the broader regulatory and enforcement structures within CARB’s authority.

Evaluating Health Impacts and Benefits

We welcomed the important discussion of the limits on CARB’s health evaluations and cost quantifications that was held before the Board at the April 2020 hearing. Staff noted that many pollutants and health endpoints are not captured in rulemaking analyses, meaning that even the substantial benefits associated with existing clean air programs and strategies associated with the MSS will remain conservative. We encourage CARB to continue working toward a more robust and representative health evaluation process as SIP and Scoping Plan strategies are developed, prioritized and implemented.

¹⁰ American Lung Association. Comment letter on Small Off-Road Engine standards workshop. June 2020. https://www.lung.org/getmedia/a7bf90b6-c426-40db-830c-d9c37bb8b60c/Lung-Assn-SORE-Comment_June-30.pdf

¹¹ Health Coalition comment letter on 2018 Low Carbon Fuel Standard calling for more stringent 2030 standard. April 2018. <https://www.lung.org/getmedia/4ac6326b-2c14-4a17-beed-208366381233/lchs-health-group-letter.pdf.pdf>

¹² California Air Resources Board. Draft Mobile Source Strategy. November 2020. p.28. https://ww2.arb.ca.gov/sites/default/files/2020-11/Draft_2020_Mobile_Source_Strategy.pdf

Thank you again for the opportunity to comment again on this important process, and for your consideration of our perspectives.

Sincerely,

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