

November 21, 2018

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

Subject: Support for Adoption of the Innovative Clean Transit Rule

Dear Chair Nichols and Members of the Board,

On behalf of the American Lung Association in California, I am writing to express our strong support for adoption of the Innovative Clean Transit (ICT) rule by the California Air Resources Board (CARB). The American Lung Association believes that the adoption of this rule is a key step in achieving clean air standards to protect public health today and ensuring the transition to zero emission transportation choices as quickly as possible.

Californians face the greatest air pollution challenges in the United States, but California is also uniquely equipped to confront this threat to public health. As California moves forward with efforts to achieve clean air and climate change standards, we urge CARB to adopt the strongest possible regulations to ensure the transition to zero emission transportation technologies. As noted in the State Implementation Plan, and reiterated in the attached letter signed by 100 health professionals, the transition to zero emissions is a critical component for achieving healthy air for all Californians.

Also noted in the 2016 Mobile Source Strategy, the ICT rule is a key component of moving California's heavy duty vehicle fleet to zero emission technologies. With the push toward zero emission transit buses already underway at many transit agencies in California and beyond, the rule builds on the momentum needed to achieve deep emission reductions across the transportation sector. As seen in the state's greenhouse gas inventory, emissions from the transportation sector increased despite overall greenhouse gas emission reductions meeting our 2020 goals. It is clear that the rapid, broad transition to zero emissions in the heavy duty sector is critical to ensuring attainment of health-protective pollution reduction goals. The ICT program is an important program on its own for local air quality benefits, technology deployment, and within the overall drive to healthy air for all Californians.

Thank you for the opportunity to comment and to continue to work with CARB staff on forming a solid proposal responsive to the need to reduce harmful pollutants as quickly as possible. We look forward to working with the Board and staff as this critical rule moves forward in support of public health.

Sincerely,



Will Barrett
Clean Air Advocacy Director

July 23, 2018

Ms. Shirin Barfjani
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Health and Medical Experts Urge Strong Action on Heavy Duty Zero Emission Technologies

Dear Ms. Barfjani:

We, the undersigned public health and medical professionals, write to urge the California Air Resources Board to accelerate strong actions to protect our air and our climate against transportation pollution. We believe that this year is critical for a definitive shift to zero emission technologies that will immediately improve the health and quality of life for Californians most impacted by harmful pollution from the heavy-duty sector.

We are particularly concerned with emissions from trucks, buses and other heavy-duty vehicles and equipment that contribute to asthma attacks, heart attacks, cancers and premature death. While heavy duty vehicles make up just 7 percent of all vehicles in California, they are the single largest source of nitrogen oxides in California and produce more particulate matter than all of the state's power plants combined.¹

Californians face the most difficult air pollution challenges in the United States, with approximately 90 percent of our residents living in counties affected by unhealthy air according to the American Lung Association's 2017 *State of the Air* report.² Additionally, another 90 percent of the residents in the most polluted regions are people of color.³ Residents of low-income communities and communities of color are more likely to be impacted by pollution from freeways and freight hubs, facing greater health threats due to high concentrations of heavy duty vehicles at warehouses, ports, railyards, freeways and on our local streets.

These challenges grow even more difficult within the context of our changing climate. Heavy duty vehicles and fuels are a major source of climate pollution, as well as black carbon that accelerates climate change and increase risks to public health, like extreme heat-related illness which exacerbate existing conditions.

As medical professionals and public health experts, we have recently seen the impacts of California's historic wildfires and mudslides, heat waves, droughts and other extreme weather events affecting our patients, our communities and the health of future generations. To avoid

¹ Union of Concerned Scientists. Delivering Opportunity: How Electric Buses and Trucks Can Create Jobs and Improve Public Health in California. www.ucsusa.org/ElectricTrucks

² American Lung Association. State of the Air 2017. www.stateoftheair.org

³ California Environmental Protection Agency. 2016. Environmental Justice Program Update 2013– 2015. www.calepa.ca.gov/EnvJustice/Documents/2016/

these extreme public health challenges becoming our new normal, we need transformative actions today.

Therefore, we ask that in 2018, the California Air Resources Board set the strongest possible policies and programs to achieve a rapid transition to zero emission technologies across the heavy duty vehicle sector, including:

- Transition all California transit bus fleets to zero emission vehicles (e.g. battery electric or hydrogen fuel cell) by 2040.
- Develop a stronger rule for zero emission truck requirements to ensure the deployment of zero emission technologies across all truck platforms and weight classes beginning in 2020.
- Create reliable and consistent opportunities for school districts to convert school bus fleets to zero emissions.
- Enact a zero emission requirement for Airport Shuttles to ensure that these short trips are not contributing to local air pollution health impacts.
- Ensure that requirements for zero emission freight equipment, including cargo handling equipment at the ports, transportation refrigeration units and drayage trucks, move forward as quickly as possible to reduce the significant health risks caused by these sources.

We thank you for your commitment to the transition to zero emission technologies. Our patients and our communities need your support to breathe clean, healthy air.

The signers of this letter are scientists, researchers, and medical professionals who live or work in California, and have expertise in public health, air pollution, and its impacts on human health. Institutional affiliations are provided for identification purposes and do not imply endorsement of the letter by those institutions.

Signers with an asterisk () signify lead signatories of the letter.*

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