

CARB Board Meeting

September 25th

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Manager of Air Quality Policy

American Lung Association in California

09-8-5

The American Lung Association commends CARB staff for thoroughly evaluating technical options to reduce pollution from locomotive and railyard sources. We are in strong agreement that more needs to be done to reduce toxic air pollution from rail operations

The current health impact is unacceptable. Diesel particulate matter is linked to hospitalizations, asthma, lung cancer and premature death. Asthma rates are at epidemic levels in areas like Long Beach, with high levels of diesel pollution due to rail and truck traffic.

As you know, ARB's health risk assessments finds that California's major intermodal facilities and rail yards create cancer risk for local communities as high as 2,500 per one million. These numbers represent real lives. The myriad of community members hear today are not a statistic but countless compelling reasons to do everything we can to protect public health.

The Lung Association urges ARB to do everything possible to protect public health. We agree with the technical options presented by staff. We urge you to consider all options on the table.

However, the approach for implementing these options needs to be reviewed. The Lung Association wants to emphasize the importance of taking a comprehensive and strong approach that includes enforceable regulation. We need incentive programs and the subsidization of key equipment, such non-preempted switch locomotives with Tier 3 Ultra-Low Emitting Switch Locomotives. But when legally permissible, we also need enforceable regulation. Finally, we need to think more strategically about public health and land use. Rail yard gates, where trucks idle in long lines, should be relocated away from schools and homes.

The American Lung Association urges ARB to report back on regulatory options as soon as possible Thank you.

CARB Board Meeting, September 25, 2009
Comments on AB 32 Administration Fee Regulation
Colleen Callahan
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American Lung Association in California

The American Lung Association in California is pleased to reiterate its strong support for the adoption of the AB 32 Administrative Fee. As we have stated in letters, workshops, and board meetings, we feel that the Administrative Fee is vitally important to maintain the important work of the staff of the California Air Resources Board and other state agencies as they administer and implement AB 32 programs.

We applaud CARB for moving forward in a responsible manner to continue to support efforts to protect our air quality, public health and environment from the worst effects of global warming by maintaining California's role as a global leader on climate policy. Among the many reasons to proceed with adoption are:

- We have seen the effects of California's budget crisis on many state programs and AB 32 implementation is too important to delay.
- The regulation will provide a stable and continuous source of funding in an equitable manner, ensuring that a broad range of major greenhouse gas emission sources are responsible for the cost.
- The overall cost of this program is minor compared to the costs of global warming to California, especially in terms of air quality and public health that are already in crisis and will be further threatened by rising temperatures, increased energy demand and emissions, and numerous other factors. Climate change impacts could cost the public health sector from \$3.8 billion to \$24 billion in additional annual costs, which would be on top of the current annual cost of \$71 billion attributed to ozone and particulate matter pollution.

Thank you again for the opportunity to voice our strong support for adoption of the Administrative Fee without delay.