

Gloria Thornton  
08-11-4

December 10, 2008

Chairwoman Mary Nichols and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Proposed Statewide Truck and Bus Regulation**

Dear Chairwoman Nichols and Board Members:

The San Francisco Asthma Task Force is very concerned about poor air quality associated with diesel pollution and urges you to approve a strong, health protective regulation. In the City and County of San Francisco, the highest rates of asthma are in zip codes with the heaviest traffic. Since high traffic roadways are often located in communities of color, this is not only a public health issue but an environmental and social justice issue.

We recognize the challenging economic times that the State is facing and want to emphasize the cost savings of the proposed in-use heavy-duty diesel vehicle regulation. The November 2008 Jane Hall study found that air pollution in the South Coast and San Joaquin Valley regions alone costs the California economy \$28 billion annually. In California, there are over 14,000 asthma-related hospitalizations a year just for children under the age of 15 with a cost of about \$19,000 per stay. The swift adoption of a strong regulation is vital to removing the health and economic burdens of unhealthy air and will ensure California meets federal air quality standards.

We applaud CARB's efforts to move forward with this ground-breaking regulation that will reduce costly public health emergencies and clean our air. We ask the Board to consider however restricting the proposed exemptions for agricultural trucks and provide a margin of safety for meeting SIP commitments. We feel the proposed regulations involving the agricultural exemptions are far too broad and compromise the health protections of the regulation for those living or working near the agriculture industry, especially the Central Valley. We suggest reducing the mileage threshold, requiring PM filters, limiting fleet size, and not expanding the definition of agricultural vehicle to include trucks owned by ancillary businesses. This will still provide special consideration to the agriculture industry, but will better protect public health.

Finally, we hope that CARB will continue vigorous outreach to truck owners to ensure incentive programs are understood and accessible. We will not see benefits from this regulation if owners are unable to comply with the rules. Ensuring owners are aware of the multiple funding sources that can be leveraged to assist individual truck and fleet owners, will maximize compliance with the rule and minimize the economic impact on owners and business.

Sincerely,

Gloria Thornton  
San Francisco Asthma Task Force Chair