

*American Lung Association in California • Bayview Hunters Point Community Advocates • Long Beach Alliance for Children with Asthma • Natural Resources Defense Council • Regional Asthma Management and Prevention • St. John's Well Child and Family Centers • Sierra Club California • Union of Concerned Scientists*

September 21, 2012

Mr Kurt Karperos  
California Air Resources Board  
1001 I Street,  
Sacramento, CA 95818

**RE: Vision for Clean Air: A Framework for Air Quality and Climate Planning**

Dear Mr Karperos:

The American Lung Association in California, Bayview Hunters Point Community Advocates, Long Beach Alliance for Children with Asthma, Natural Resources Defense Council Regional Asthma Management and Prevention, St. John's Well Child and Family Centers, Sierra Club California, and Union of Concerned Scientists strongly support the effort by the Air Resources Board (ARB), San Joaquin Valley, and the South Coast Air Quality Management District to develop the Vision for Clean Air: A Framework for Air Quality and Climate Planning. While California has made major strides in reducing emissions and improving air quality through decades of targeted policies, much work remains to achieve healthy air throughout the state. In addition, California faces significant challenges from a warming climate including stresses on the state's water resources, rising sea levels, and adverse impacts on agriculture and public health. The Vision for Clean Air provides a vital resource for guiding the development of a comprehensive strategy to meet health-based air quality standards and reduce climate change emissions over the next 40 years. The multi-pollutant approach that underlies the Vision for Clean Air is necessary for developing coordinated, effective, and efficient strategies for addressing air pollution and climate change emissions.

Please find below some comments and recommendations regarding the Vision for Clean Air.

**Discussion of Benefits of Achieving the Vision for Clean Air**

The Vision document and underlying analysis provide a basic understanding of the scope of the transformation needed in our transportation and energy sectors to achieve dramatic reductions in emissions by 2050. The Vision tells a story about how technology can play a fundamental role by accelerating the deployment of near-zero emission technologies, improving efficiency, deploying advanced emission controls, developing cleaner fuels, and ramping up a more renewable electricity grid. However, the Vision is incomplete, in that the benefits of achieving such a transition are not articulated.

The document should include some discussion of the potential benefits of achieving the Vision, beyond complying with federal air quality standards and meeting California targets for climate change emission reductions by 2050. Leadership in addressing air quality and climate change will advance California's leadership in these areas and provide economic opportunities through

investments in new technologies and infrastructure. Californians will benefit from improved air quality, reduced negative health outcomes and billions of dollars saved per year in health care costs, and lost school and work days. And California policy leadership and technology advancement can provide a model for state, federal, and international action on climate change.

We recommend articulating these and other potential benefits of achieving the Vision for Clean Air, including the transition away from oil as the state's primary transportation fuel.

### **Incremental Progress and Accelerated Advanced Technology Deployment are Necessary**

The modeling effort demonstrates that multiple strategies must be deployed in parallel, not relying on silver bullet solutions. To achieve our clean air goals, advancement of internal combustion emission control technology must continue, in addition to steady progress towards cleaner and lower carbon fuels, accelerated development and deployment of advanced zero and near-zero emission technologies, and improvements in efficiency for all transportation modes. A combination of policies including performance-based standards, accelerated technology development programs, and incentive funding will all be critical to successfully achieve the 2050 Vision.

### **Additional Effort Needed to Identify Pathway for Meeting Ozone Standards**

The scenarios modeled as part of the Vision analysis result in obtaining significant reductions in smog-forming nitrogen oxide emissions and global warming emissions. However, the scenarios fail to show attainment of the 2032 federal deadline for ozone. Further efforts to identify pathways for this air quality deadline should be undertaken.

### **Consideration of Disproportionate Impacts in Technology Deployment Decisions**

The Vision describes a framework for accelerating advanced zero emission technologies in various sectors through a planning, prototype, demonstration, and deployment process. The burden of air pollution is not equally shared across California or within regions. Communities near large numbers of diesel combustion sources including ports, rail yards, and warehousing are exposed to higher levels of emissions and higher cancer risk than other communities. As plans are developed to deploy zero and near-zero emissions technologies, priority should be given to implement the technology in the communities currently most impacted by air pollution.

### **Additional pollutants must be incorporated into the analysis**

The introduction of the document discusses the crosscutting issues of climate, criteria pollutants, and air toxics. However, the analysis and presentation of the results focuses exclusively on nitrogen oxide (NOx) and greenhouse gas emissions. Further discussion, and more importantly inclusion, of additional pollutants in the scenario development including direct PM2.5 emissions and volatile organic compounds (VOCs) which contribute to smog and fine particulates, is needed. A qualitative description of the implications of this exercise on air toxics would also be helpful.

### **Additional analysis needed to inform SIP development, AB32 Scoping plan updates, SB375 implementation and funding needs**

Development of a more detailed understanding of the technology progress needed in each sector over the next decade to get us on track to meet the 2050 Vision is needed. For example, what advances in emission control technologies are needed and by when in order to successfully implement more stringent NOx emissions standards for on-road and off-road diesel engines in the 2020 to 2025 timeframe? The Vision analysis relies on improving the efficiency of our

transportation system, in addition to deployment of specific vehicle and fuel technologies. However, there is no detailed discussion of specific strategies that could be employed to improve operational and system efficiency. Exploration of strategies to achieve system-wide efficiency, such as smart pricing and tolling, logistics improvements, and infrastructure innovations are needed. Further analysis of technology options and efficiency strategies will help guide State Implementation Plan development, AB32 Scoping Plan updates in 2013, implementation of SB375 and regional transportation and land use planning, as well as provide evidence for the amount of additional funding resources needed in the short term.

We applaud the effort by ARB, San Joaquin Valley Air District, and the South Coast Air Quality Management District in developing the Vision for Clean Air. The analysis brings into focus the level of transformation needed in our transportation and electricity sectors to address the public health and environmental challenges we face from poor air quality and climate change. We encourage the agencies to work with stakeholders to develop and implement the specific strategies necessary to achieve the Vision for Clean Air.

Sincerely,

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