



February 28, 2021

Liane Randolph, Chair
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Subject: Comments on Mobile Source Strategy

Dear Chair Randolph:

As members of the health and medical community in California, we are writing to encourage the California Air Resources Board (CARB) to adopt a clear path toward achieving a zero-emission transportation sector as rapidly as possible. As outlined in Governor Newsom’s Executive Orders N-19-19 and N-79-20, the transition to zero-emission transportation and the expansion of healthier, active transportation, transit and other healthy mobility options are vital to a healthy and sustainable California. CARB’s Mobile Source Strategy (MSS) is a prime opportunity to set the path for better health for all Californians, especially for those most impacted by historically inequitable transportation decisions and land use patterns.

California faces the most difficult air pollution challenges in the United States. The transportation sector accounts for approximately 80 percent of ozone- and particle-forming NOx emissions and roughly half of the state's climate-forcing greenhouse gas emissions. California is home to seven of the ten most ozone-polluted cities in the country, and six of the most particle-polluted cities in the nation according to the American Lung Association's [State of the Air 2020 report](#). The impacts of these pollutants range from asthma attacks, heart attacks, strokes, and other cardiovascular and respiratory illnesses. Particle pollution also contributes to lung cancer and is noted in the draft MSS to be responsible for an estimated 5,000 deaths per year in California. These health burdens are felt most acutely by people living with asthma and other 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 negative health effects.

There is a clear need to transition rapidly to a pollution-free transportation system in pursuit of reaching our air quality and climate standards, and our health, equity, and mobility goals. As CARB moves toward the completion of the MSS process, we offer the following comments to advance a transportation system in California that is healthier for all residents.

Sustainable Communities and Active Transportation

Despite a decade of implementation of California's Sustainable Communities and Climate Protection Act (SB 375; Steinberg, 2008), California remains off-track to achieving healthier, more sustainable communities through improvements in land-use and transportation planning. California must focus on reducing harmful emissions and vehicle miles traveled (VMT) by investing in healthy mobility options in existing communities, prioritizing fix-it-first infrastructure spending over expansion, developing funding strategies that advance sustainable communities and ensuring climate, health and equity are clearly incorporated into funding guidelines to ensure public funding is advancing – not hindering – progress toward a healthier transportation system.

As noted in the MSS, “[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.” Further, the [California Integrated Transport and Health Impact Model](#) housed on the California Department of Public Health website illustrates that achieving active transportation projections in the most recent Climate Change Scoping Plan could yield over 11,300 fewer chronic disease deaths annually by 2030 due to increased physical active transportation. Correcting course on SB 375 to achieve these health improvements through increased physical activity must be central to the MSS and upcoming Scoping Plan process.

- We urge the Board to place a higher priority on actionable strategies and programmatic guidelines that support increased walking, cycling and transit, and equitable investments at local, regional and state levels to secure healthy, sustainable communities for all Californians.
- CARB should work closely with stakeholders, sister agencies and the California State Legislature to update SB 375 and to implement Executive Order N-19-19 to ensure meaningful shifts in active transportation, land use and transportation investment decisions.

Zero-Emission Vehicles and Fleets

We support the direction to achieve near- and long-term reductions in criteria and climate pollutants through a robust transition to zero-emission technologies across the transportation sector as rapidly as possible. The widespread transition from combustion technologies (*e.g.* gasoline, diesel, natural gas) toward light-, medium- and heavy-duty zero-emission vehicles is critical to improving public health and achieving clean air and climate standards. For instance, a widespread transition to electric cars, trucks and buses could yield up to \$22 billion in annual public health benefits in California, according to the American Lung Association's [Road to Clean Air report](#). We ask that CARB continue its efforts to meet the state's climate and air quality standards and ensure equitable access to zero-emission technologies and associated health benefits. We believe that the MSS should ensure a pathway for:

- Enacting zero-emission technology standards that achieve Governor Newsom's Executive Order N-79-20 for 100 percent sales of new zero-emission passenger vehicles in California by 2035, transition off-road equipment to zero-emission by 2035, and transition medium- and heavy-duty vehicles by 2045 along with a full transition to a zero-emission port truck/drayage fleet by 2035.
 - We support CARB's Advanced Clean Fleet proposal to require that any truck added to the CARB Drayage Truck Registry to be zero-emissions by 2023 and for the retirement of vehicles meeting their full useful life.
- Coordinating with sister agencies to align incentive funding to accelerate the deployment of zero-emission vehicles and infrastructure.

Cleaning up Combustion Vehicles

While CARB leads the way on setting standards and incentive investments to achieve a 100 percent zero-emission transportation sector in California, we must also ensure that harmful pollution from combustion vehicles is significantly controlled, enforced, and ultimately eliminated. Removing the state's oldest, dirtiest vehicles from the road will require a collaborative, comprehensive approach, and we urge CARB to continue its efforts to clean up this transportation pollution. Specifically, we request that CARB prioritize:

- Fully implementing the Heavy-Duty Inspection and Maintenance "Smog Check for Trucks" program statewide in 2022.
- Developing and implementing requirements for the retirement of heavy-duty trucks that reach their full useful life. Retirement of the oldest, highest-polluting trucks will yield major reductions in carcinogenic diesel particle pollution and smog- and particle-forming NOx emissions.
- Setting Advanced Clean Car Standards that include more stringent emissions controls on the passenger vehicle combustion fleet and ensure real-world clean air benefits are not lost to program flexibilities.
- Strengthening the 2030 carbon intensity requirements under the Low Carbon Fuel Standard and extend the standard beyond 2030 to further clean up combustion fuels.
- Ramping up enforcement of existing standards to ensure real-world benefits of established and planned standards, including targeted enforcement in highly impacted communities.

We look forward to continuing to work with the California Air Resources Board to ensure strong progress is made toward healthier, more sustainable communities for all Californians. Please contact Will Barrett with the American Lung Association at william.barrett@lung.org for additional information.

Sincerely,

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