



November 1, 2016

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

RE: Lung Association Charters Support Strong ZEV Program

Dear Chairman Nichols,

On behalf of the American Lung Association charters representing the states participating in the California Air Resources Board's Zero Emission Vehicle (ZEV) program, we are writing to support the program and to encourage updates to the program for 2025 to ensure achievement of our states' clean air and climate goals. Our states have long supported California's authority to adopt stronger vehicle emission standards and have acted to bring these programs home to benefit the health of our residents. In addition to embracing the ZEV program, our states have adopted complementary policies to support ZEV infrastructure and promote ZEV sales. Several states have also entered into a multi-state Memorandum of Understanding (MOU) that requires increasing numbers of ZEVs. We want to work with you as CARB moves into the Mid-Term Review (MTR) process to ensure a strong ZEV program that brings the full health and environmental benefits of ZEV technologies to our communities.

Moving to zero emission transportation is essential to reduce significant sources of ozone and particulate matter pollution as well as risks to our climate. The 2016 "American Lung Association State of the Air" report documents the harms to public health caused by ozone and particulate matter pollution across the country, with some counties in all but one ZEV state receiving F grades for either ozone or particulate matter pollution. Numerous studies¹ highlight the impacts of traffic pollution on human health, with increased risk of asthma attacks in children, heart attacks, reduced lung function and premature death for those living in close proximity to major roadways. Across the 10 ZEV States, transportation sources amount to nearly half of greenhouse gas emissions² that drive climate change and associated public health

¹ American Lung Association. State of the Air 2016, Living Near Highways and Air Pollution. <http://www.lung.org/our-initiatives/healthy-air/outdoor/air-pollution/highways.html>

² US Energy Information Administration. Energy-Related Carbon Dioxide Emissions at the State Level, 2000-2013. October 2015. <http://www.eia.gov/environment/emissions/state/analysis/>

challenges, including increased air pollution, heat waves, wildfires, flooding, extreme weather events and many other public health risks.

The “Clean Air Future” report released on October 27, 2016 by the American Lung Association in California in collaboration with the lung association charters on this letter found that widespread transition to ZEVs in the 10 ZEV States by 2050 could yield tremendous annual benefits including: saving over \$33 billion in health and climate costs and preventing, over 96,000 pollution-related asthma attacks, over 2,200 premature deaths and 195,000 lost work days compared to today’s fleet. This report underscores that a strong ZEV program that sets us on a trajectory to a full ZEV fleet is critical to improve health and reduce climate pollution in all our states.

Adjustments Needed To ZEV Program: We are concerned that the ZEV program, as currently implemented, will not support the ramp up of ZEVs needed to meet clean air and climate change goals across our states. For example, the ZEV compliance program relies on an outdated credit system. Advances in vehicle technologies (*e.g.* 200 mile range battery) that were not accounted for when the current rules were adopted in 2012 will allow auto companies to generate excess compliance credits under the ZEV program that reduce the numbers of ZEVs on the road in California and other states. Recent analyses have shown that the numbers of ZEVs expected under the program could drop substantially by 2025 if this problem is not corrected.

In addition to the potential reduction in actual ZEVs on the road, we are concerned that the current program allows credits generated by placing ZEVs in California to count as compliance in other states. This “Travel Provision” allows automakers to focus nearly all of their effort in California, stalling ZEV deployment across the country. It is critical to our efforts that this provision end in 2017.

Recommendations: We urge the California Air Resources Board to act as quickly as possible to strengthen the ZEV program to ensure it requires automakers to build, sell and promote ZEVs in our states. We offer the following recommendations as CARB enters the Mid Term Review process:

- **Ensure the ZEV Program is on Track:** The California Air Resources Board should carefully evaluate the potential for vehicle shortfalls created by inflated credit supply in the ZEV program. CARB should begin work to update the program in 2017 to ensure 1.5 million ZEVs are on the road in California and over 3.3 million ZEVs are on the road across all 10 ZEV States by 2025. Failing to address shortfalls in the number of ZEVs projected for 2025 now will only make achieving longer-term clean air and climate goals that much more difficult.
- **End the Travel Provision:** CARB must ensure the Travel Provision for battery electric and plug-in hybrid vehicles expires as planned in 2017, and must not extend any form of this provision that restricts ZEV availability in our states. The residents of all of the 10 ZEV States deserve a program that ensures greater ZEV deployment to reduce emissions,

including near-roadway exposures to vehicle pollution. Allowing this loophole to expire in 2017 is an important step toward expanding the benefits of the ZEV program beyond California. Similarly, CARB should phase out the Travel Provision for Hydrogen Fuel Cell Vehicles that currently has no expiration date.

We look forward to working with the California Air Resources Board in the years ahead to improve air quality and health by ensuring a strong, viable ZEV program.

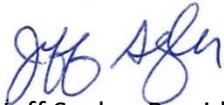
Sincerely,



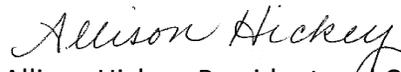
Olivia J Diaz-Lapham, President and CEO
The American Lung Association in California



Deborah P. Brown, President and CEO
American Lung Association of the Mid-Atlantic
New Jersey and Maryland



Jeff Seyler, President and CEO
American Lung Association of the Northeast
Connecticut, Maine, Massachusetts, New York, Rhode Island and Vermont



Allison Hickey, President and CEO
American Lung Association of the Mountain Pacific
Oregon

cc:

Members, California Air Resources Board
Richard Corey, Executive Officer, California Air Resources Board
Anne Gobin, Bureau Chief, Connecticut Bureau of Air Management
Marc Cone, Bureau Director, Maine Bureau of Air Quality Control
George Aburn, Jr., Director, Maryland Air and Radiation Management Administration
Christine Kirby, Division Director, Air Quality and Climate Programs, Mass. Bureau of Waste Prevention
Francis Steitz, Director, New Jersey Division of Air Quality
Steve Flint, Director, New York Division of Air Resources
Wendy Wiles, Division Administrator, Oregon Environmental Solutions Division
Douglas L. McVay, Chief, Rhode Island Office of Air Resources
Heidi Hales, Director, Vermont Air Quality & Climate Division