



April 25, 2023

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

Health Comments on CARB Actions to Cut Freight Pollution
In-Use Locomotive and Advanced Clean Fleet Rules will save over 5,000 Lives

Dear Chair Randolph and Members of the Board:

As health and medical organizations and healthcare professionals, we write to encourage the board to seize the opportunity before you and adopt life-saving programs to cut harmful pollution from the locomotive and trucking sectors. Combined, the California Air Resources Board's (CARB) adoption and implementation of the In-Use Locomotive Regulation and the Advanced Clean Fleets rules are among the most significant actions CARB can take to achieve clean air standards, address disparities in freight-related pollution burdens and reduce occupational exposures to carcinogenic diesel exhaust.

By voting to approve the In-Use Locomotive and ACF standards, CARB's April 2023 hearing will represent one of the most productive moments in reducing harms caused by combustion in the

transportation sector. Health and medical voices have encouraged CARB to strengthen the proposed Locomotiveⁱ and ACFⁱⁱ rules and to continue to monitor for opportunities to further reduce asthma attacks, heart attacks and strokes, lung cancer and premature death associated with pollutants from these sources.

Implementing the In-Use Locomotive Standard and the ACF will save over 5,000 lives and generate nearly \$60 billion in public health benefits by cutting particle pollution (PM_{2.5}) by 2050.¹

We stand in strong support of CARB taking the following actions at its April 2023 hearing:

Adopt the In-Use Locomotive Standard

This policy represents the single largest action identified in the 2022 State Implementation Plan for Ozone attainment. Ensuring cleaner locomotive operations and moving California to cleaner, and zero-emission technologies in this sector is critical to meeting regional air quality standards. This is especially true in terms of alleviating suffering in vulnerable communities nearest railyards and addressing negative health consequences of locomotive pollution on children, rail industry employees and passengers.² The proposed rule will cut almost one-third (63.2 tons per day in 2037ⁱⁱⁱ) of the total oxides of nitrogen (NO_x) needed in order to meet the National Ambient Air Quality Standard for Ozone. Further, the policy is projected to cut cancer risk associated with diesel particle emissions by over 90 percent in communities nearest major rail operations. We encourage the board to approve the In-Use Locomotive standard and continue to monitor program implementation, zero-emission technology advancement and data on locomotive idling for opportunities to further strengthen the rule. Estimated health benefits of this rule by 2050 include:

- Monetized health benefits: \$32 Billion
- Lives saved: 3,233^{iv}

Adopt the Advanced Clean Fleet Standard

The ACF is a critical complement to the Advanced Clean Trucks measure approved with strong support of California's health community in 2020. The transition to zero-emission trucks is a critical public health and health equity intervention, and the ACF rule will hasten this shift among port trucks and other fleets causing damage to community health throughout the state. The zero-emission truck sales requirement for 2036 is a major milestone on the path toward eliminating the harms of combustion technologies in the trucking sector. We call on CARB to approve this rule and consider opportunities to expand the move quickly to integrate the ACF within the suite of CARB trucking policies for continued and consistent transition to zero-emission trucks while also ensuring the retirement of the oldest, highest-polluting vehicles when they reach reaching useful life

¹ Not included in these figures are a wide range of negative health effects caused by diesel particle emissions and ozone pollution. According to the California Air Resources Board's Health Analyses for the Proposed In-Use Locomotive Regulation at p.29: "...CARB's mortality and illness valuation is just for PM_{2.5}, there are other pollutants that can cause health issues. For instance, NO_x reacts with other compounds to form ozone, which can then cause respiratory problems. Updated health impact functions and valuation for ozone are also provided in the aforementioned Cross-State Air Pollution Rule TSD provided by the U.S. EPA. Additionally, toxic air containments (TAC) emitted from diesel engines can lead to cancers...The scientific literature has demonstrated the broad impacts of exposure to pollution, specifically living and working near locomotive activity, which go beyond what staff have quantified..." <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/locomotive22/apph.pdf>

² A thorough discussion of research into locomotive contributions to cancer, respiratory health impacts, impacts on children, occupational exposures, disparities and other impacts of locomotive pollution can be found in the above referenced CARB staff health analysis at pp.31-34.

milestones. The ACF represents the second largest NOx emission reduction program in the State Implementation Plan for Ozone and will yield major public health benefits, including:

- Monetized health benefits: \$26.5 billion
- Lives saved: 2,526^v

Combined, these rules represent over half of the total California-specific NOx reductions needed to attain ozone standards, and roughly 40 percent of the total SIP measures when much-needed federal action is included. Approving and implementing these landmark standards means Californians – and especially those most impacted by freight sector emissions – will be able to breathe cleaner, healthier air and face fewer health emergencies, healthcare costs and early deaths.

CARB is a public health agency and has the strong support of California's public health and medical community to make these potential benefits a reality through the adoption of these life-saving standards. Please contact Will Barrett with the American Lung Association at William.Barrett@Lung.org for any additional information.

Sincerely,

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ⁱ Public Health Organizations. Comments to California Air Resources Board. November 2022. <https://www.lung.org/getmedia/37acd67e-5917-4b57-9239-06554cb5f48b/Health-Group-Support-Locomotive-Rule.pdf>

ⁱⁱ Public Health Organizations. Comments to California Air Resources Board. October 2022. https://www.lung.org/getmedia/ed622515-6476-4687-91bb-454439d26765/Health-Groups-Call-for-Stronger-ACF-Rule_10-14-22.pdf

ⁱⁱⁱ California Air Resources Board. 2022 State Strategy for the State Implementation Plan, Table 7 at p. 38. September 2022. https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

^{iv} CARB. Proposed In-Use Locomotive Regulation. Appendix H: Health Analyses for the Proposed In-Use Locomotive Regulation, Table 13 at pp.25-6, and Table 15 at p. 28. March 2023. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/locomotive22/apph.pdf>

^v CARB. Proposed Advanced Clean Fleets Regulation. Appendix B: Updated Cost and Benefit Evaluation, Table 2 at pp.6-7. April 2023. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/acf15db.pdf>