American Lung Association.
California

October 23, 2020

Jen Gress, Branch Chief
Sustainable Transportation and Communities
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted via email: mss@arb.ca.gov

Subject: Comments on Mobile Source Strategy Workshop Draft

Dear Dr. Gress,

On behalf of the American Lung Association, I am writing to provide comments on the most recent workshop and draft of the 2020 Mobile Source Strategy (MSS). The American Lung Association has engaged in the development of the MSS document throughout the public process to date and looks forward to engaging with the California Air Resources Board (CARB) over the coming months and beyond the adoption of the plan.

Largely due to the transportation sector, Californians face the most difficult air pollution challenges in the United States, home to seven of the ten most ozone-polluted cities in the United States, and six of the ten most particle-polluted cities in the nation according to the American Lung Association's *State of the Air* 2020 report.[1] 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.[2] The impacts of these pollutants range from asthma and other respiratory impacts to heart attacks and other cardiovascular impacts. Particle pollution also contributes to lung cancer, and is 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 disparities. Reducing transportation pollution in line with levels needed to achieve clean air and climate standards is vital to improving and protecting public health for all Californians.

General Comments

The continued multi-pollutant approach laid out in the draft MSS is critical to ensuring California is efficient in meeting both its air quality and climate standards. The MSS is especially timely within the range of various transportation planning processes underway across the state, including CalTrans' California Transportation Plan 2050, CalSTA's implementation of Governor Newsom's Executive Order N-19-19 and others that are running alongside CARB's suite of mobile source regulations for passenger vehicles, ride-hailing services, marine and locomotive applications and the Advanced Clean Trucks fleet rule process. Clearly, the state is taking a serious view of the need to clean up transportation pollution in pursuit of air quality, climate, public health, equity and mobility goals and acknowledging that there is a long road ahead. As noted in the health coalition letter commenting in support of the Low NOx Omnibus rule, we

[1] American Lung Association. State of the Air 2020. www.lung.org/sota
[2] California Air Resources Board. Mobile Source Strategy 2020 Workshop Draft. September 2020. p. 50. https://ww2.arb.ca.gov/sites/default/files/2020-09/Workshop_Discussion_Draft_2020_Mobile_Source_Strategy.pdf

believe that "the 2020 Mobile Source Strategy should clearly illustrate a comprehensive pathway toward achieving clean air and climate standards..."[3] The 2020 MSS should include clear quantifications of the strategies needed to ensure multi-pollutant attainment in the short-, medium- and long-term, and should set up forthcoming rulemakings to illustrate the health benefits of doing so.

Comments on Process to Date

The American Lung Association participated in the legislative process supporting the passage of Senate Bill 44 (Skinner, 2019), and recognize the pace of work that has required of CARB staff to develop the 2020 MSS. Within the condensed timeframe, we appreciate that we have been able to provide a public health perspective during public workshops in March and October, and during the April CARB Hearing informational item, and recognize that staff have taken steps to include a broader evaluation of mobile sources beyond the trucking sector that was central to SB 44. We also appreciate that the workshop draft was shared a week in advance of the October 7 workshop. Looking forward, we encourage the continued release of materials with ample time for public review - this will be an important practice as the board moves into SIP planning and the next Scoping Plan update.

Vehicle Miles Traveled

The focus on reducing Vehicle Miles Traveled (VMT) in the MSS emphasizes that California continues to fall short of our goals for building healthy, sustainable communities and that we simply cannot achieve our clean air and climate standards through technology alone. The MSS correctly notes that "[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."[4] We appreciate the discussion in the draft MSS of the challenges experienced at the local, regional and state levels contained in the Progress Report Document on SB 375 Sustainable Communities Strategies, and the identification of strategies to build toward the reductions needed. The continued collaborative work of CARB and sister agencies, local governments and regional planning agencies is critical to sharing best practices, thorough data analysis and building health and equity into the fabric of land use and transportation planning efforts. The themes laid out in the draft MSS, coupled with shifting direction by state transportation agencies toward aligning transportation investments with achieving California's climate standards[5] through projects that reduce vehicle miles travelled, provide a strong foundation for more efficient transportation, land use and mobility systems that serve the needs and health of all California communities.

Vehicles and Fuels

The American Lung Association supports the direction to achieve near- and long-term reductions in criteria and climate pollutants through requirements for cleaner technologies and the transition to zero emission technologies across the transportation sector. The recent *Road to Clean Air* report by the American Lung Association found that the transition to zero emission cars, buses and trucks over the coming decades could lead to over $22 billion in public health benefits annually in California, including over 1,900 premature deaths avoided; 26,000 asthma attacks avoided; and 122,000 lost work days avoided on an annual basis due to pollution reductions in the year 2050 alone.[6] We support the ongoing transition to widespread

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[3] American Lung Association et al. Comment letter on Low NOx Omnibus rule. August 2020. https://www.lung.org/getmedia/2dc81c65-a83b-40ae-9f08-f2d6ac87d774/health-groups-low-nox-letter-8-20-20_final.pdf

[4] California Air Resources Board. Mobile Source Strategy 2020 Workshop Draft. September 2020. p. 50. https://ww2.arb.ca.gov/sites/default/files/2020-09/Workshop_Discussion_Draft_2020_Mobile_Source_Strategy.pdf

[5] Governor Gavin Newsom. Executive Order N-19-19. September 2019.

[6] American Lung Association. Road to Clean Air. September 2020. www.lung.org/ev

transportation electrification as well as CARB's commitment to requiring cleaner combustion technologies. Key strategies for achieving healthy air and climate will require:

- Enacting zero emission technology standards that achieve Governor Newsom's Executive Order N-78-20 for 100 percent sales of new zero emission vehicles in California by 2035, along with additional acceleration of the medium- and heavy-duty vehicles, with full transition to a zero emission drayage fleet by 2035.
- Setting Advanced Clean Car Standards that include more stringent controls on the passenger vehicle combustion fleet, in terms of both criteria air pollutants and greenhouse gases.
    - Twenty health and medical organizations recently issued a letter outlining our recommendations for the ACC II program, calling for greater focus on achievement of real-world emissions benefits through more stringent standards and elimination of program flexibilities that lead to greater pollution burdens.[7]
- Enacting a strong Clean Miles Standard to reduce emissions, support zero emission technologies and reduce vehicle miles traveled in the ride-hailing sector.
- Ramping up strong enforcement of existing standards to ensure real-world benefits of established and planned standards, especially important in the Low NOx Omnibus rule and Advanced Clean Cars programs.
- Accelerating the full, statewide, implementation schedule for the comprehensive Heavy Duty Inspection and Maintenance "Trucks Smog Check" Program established under Senate Bill 210 (Leyva, 2018).
- Accelerating the Small Off-Road Equipment (SORE) requirements for zero emission equipment to 2023 as called for in our June 2020 letter to CARB.[8]
- Strengthening the 2030 carbon intensity requirements[9] under the Low Carbon Fuel Standard, and extend the standard beyond 2030 to further clean up combustion fuels.
- Maintaining progress or accelerating timelines for adoption and implementation of zero emission Transportation Refrigeration Units, Commercial Harbor Craft, locomotives and other off-road mobile sources.

Incentive Funding

Across many of the planning processes underway across the state, we note the challenge of funding available to accelerate emission reductions to protect public health. Within the MSS process, we remain concerned that incentive funding for supporting fleet turnover, consumer incentives, equity-based funding programs, AB 617 program implementation and others being subject to significant shifts from year to year. Even in higher funding years, available funding is often far short of demand.[10] Within the current economic context, the MSS notes significant risk of limited funding due to COVID and other economic factors:

> Even prior to the current crisis, incentive funding was not yet at the levels needed to achieve the level of vehicle and equipment turnover necessary for attainment of near-term SIP deadlines. Given the reduced monetary resources available for incentives in the near-term due to COVID-19, increased emissions reductions from regulatory programs may be necessary.[11]

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[7] American Lung Association et al. Comment letter on Advanced Clean Cars II Workshop. October 2020. https://www.lung.org/getmedia/b07ffa2b-9fdf-4992-9308-97f3a5f0455e/Health-Coalition-Comments-on-ACCII_10-16-20.pdf
[8] American Lung Association. Comment letter on Small Off-Road Engine standards workshop. June 2020. https://www.lung.org/getmedia/a7bf90b6-c426-40db-830c-d9c37bb8b60c/Lung-Assn-SORE-Comment_June-30.pdf
[9] American Lung Association et al. Comment letter on 2018 Low Carbon Fuel Standard calling for more stringent 2030 standard. April 2018. https://www.lung.org/getmedia/4ac6326b-2c14-4a17-beed-208366381233/lcfs-health-group-letter.pdf.pdf
[10] California Air Resources Board. Workshop Draft Mobile Source Strategy 2020. p.25. https://ww2.arb.ca.gov/sites/default/files/2020-09/Workshop_Discussion_Draft_2020_Mobile_Source_Strategy.pdf
[11] *Ibid.* p.37.

The American Lung Association and our colleagues in the health and medical community are vocal in support of incentive and programmatic funding to accelerate clean air and climate progress. Given recent over-subscription to low carbon transportation grant programs and the current economic crisis driven by COVID-19, we remain concerned that funding to accelerate attainment of health-protective standards will remain constrained. As the upcoming SIP and Scoping Plan processes move forward, we call on CARB to determine avenues for new regulations and to increase pace and stringency within the development and implementation of planned and existing rules. We also call on CARB to ensure emission reductions are targeted to California's most heavily and disproportionately impacted communities, including within the context of the AB 617 Community Air Protection Program, through equity-based incentive programs that are funded, and - critically - through the broader regulatory and enforcement structures within CARB's authority.

Evaluating Health Impacts and Benefits

The American Lung Association welcomed the important discussion of the limits on CARB's health evaluations and cost quantifications that was held before the Board at the April 2020 hearing. Staff noted that many pollutants and health endpoints are not captured in rulemaking analyses, meaning that even the substantial benefits associated with clean air programs remain conservative. For example, three recently adopted clean air rules were found to result in major health benefits for Californians, and especially those most impacted by freight pollution:

- Low NOx Omnibus Truck: $36 billion in health benefits by 2050
- Advanced Clean Truck Rule: $8.9 billion in health benefits by 2040
- Ocean-Going Vessels at Berth: $2.32 billion in health benefits by 2031

Still, because the benefits of the rules are limited to a subset of pollutants and heath endpoints, these values are not telling the full story. As noted in the health evaluation of the At Berth regulation, with significant – *but not monetized* – cancer risk reduction benefits in disadvantaged communities:

> Although PM mortality and illness valuation has been, and continues to be, a useful metric for valuating the health benefits of regulations, it only represents a portion of those benefits. Given this, the full health benefits of a regulation are expected to be underestimated because all adverse health outcomes associated with air toxics are not monetized. A more robust evaluation of outcomes, including, but not limited to, preterm birth, neural tube defects, nonfatal cancers, and fatal cancers would provide a more complete perspective of the benefits from reduced exposure to air toxics.[12]

We encourage CARB to continue working toward a more robust and representative health evaluation process as SIP and Scoping Plan strategies are developed, prioritized and implemented.

Thank you again for the opportunity to comment again on this important process, and for your consideration of our perspective.

Sincerely,

Will Barrett
Director, Clean Air Advocacy

[12] California Air Resources Board. Ocean Going Vessels At Berth. Initial Statement of Reasons. Appendix G. October 2019. p. G-61. https://ww3.arb.ca.gov/regact/2019/ogvatberth2019/appg.pdf