October 28, 2021

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

Subject: Comments on Sustainable Communities within the Mobile Source Strategy

Dear Chair Randolph and members of the Board:

On behalf of the American Lung Association and the Local Government Commission, we are writing to comment on the Mobile Source Strategy (MSS) proposed by the California Air Resources Board (CARB). Our organizations believe that the MSS has improved over time and continues to highlight significant challenges and opportunities in reaching California's transportation pollution reduction targets.

We appreciate the MSS bringing attention to the role of healthy, sustainable communities in reducing harmful pollution and improving community health and resiliency. Californians face the most difficult air pollution challenges in the United States, with seven of the ten most ozone-polluted cities in California, along with six of the most particle-polluted according to the American Lung Association's *State of the Air* 2021 report.[1] These impacts threaten health in multiple forms, contributing to approximately 7,500 premature deaths annually in California. Lower-income communities and communities of color often face the greatest risks due to generations of disinvestment and policies that lead to inequitable exposures in harmful pollution and associated disparities in poor health outcomes. The MSS notes the role of sustainable communities in improving health, and the need for targeted interventions to ensure health improvements in all communities:

> *The potential health benefits from replacing fossil fuels in the transportation sector with public transportation and active transport are substantial. More needs to be done to make sure that these critical transportation options are safe, accessible, and meet the needs of low-income and disadvantaged communities.*[2]

Climate change contributes to the difficulties of maintaining strong progress in cleaning the air, as increased heat, drought, and wildfires accelerate conditions for unhealthy air. From zero-emission transportation to cleaning up heavy-duty engines to improved land use and transportation planning, all aspects of the transportation system must be addressed to ensure healthier communities for all Californians.

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[1] American Lung Association. *State of the Air 2021*. April 2021. www.lung.org/sota

[2] California Air Resources Board. *Mobile Source Strategy* at p. 72. September 2021. https://ww2.arb.ca.gov/sites/default/files/2021-09/Proposed_2020_Mobile_Source_Strategy.pdf

Within CARB's multiple planning and regulatory strategies, ensuring safe, healthy, and accessible transportation options must remain at the forefront along with engine and fuel policies. Successfully reducing harmful pollution associated with land use and transportation planning will require ongoing outreach and coordination with local, regional, and state partners. Our organizations collaborated on a joint 2020 project highlighting this point:

> *Meeting California's increasingly ambitious climate goals will require significant emissions reductions from transportation sources. Electrification is one critical part of the solution, but reducing infrastructure costs, congestion and the degradation of natural resources will require a more holistic approach that includes policies and investments to advance active transportation and transit...*[3]

Our organizations support the widespread transition to zero-emission transportation, but acknowledge that – as noted in the MSS – these technologies must be paired with land use policies designed to protect health and ensure a sustainable, resilient future for communities throughout California. In fact, the California Greenhouse Gas Emissions Inventory released in July 2021 noted that the pollution control benefits of cleaner vehicle and fuel policies are negatively impacted by ongoing increases in vehicle miles traveled:

> *…while progress around deployment of cleaner vehicle technology and fuels was significant, it was also dampened by continued increases in per capita vehicle miles travelled from passenger vehicles.*[4]

State agencies must continue to move beyond planning to implementation of policies that reduce impacts of land use and transportation in the real world. For example, the California State Transportation Agency (CalSTA) released its Climate Action Plan for Transportation Infrastructure (CAPTI) in response to Executive Order N-19-19 calling for better alignment of state transportation investments with meeting climate targets. Key to this document is a series of action steps[5] needed by state agencies, such as revisions to funding guidelines that ensure public funds are not working at cross purposes with state goals. We call on CARB to take the steps necessary to ensure strong, collaborative partnerships outlined in the MSS which notes:

> *…successful VMT reduction policy relies on reinforcement across all levels of government using multiple policy levers. Meeting the magnitude and complexity of the challenge will require improved alignment across multiple agencies and systems.*[6]

In moving from the Mobile Source Strategy to implementing policies that drive real change, we encourage CARB to lay out clear actions to be taken to reduce VMT that allows for ongoing progress tracking and more rapid course correction. CARB should also partner and support local governments in tracking emissions by developing local greenhouse gas emissions inventories at the city and county level. This could help with a range of policy evaluations,

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[3] Local Government Commission, American Lung Association. *The Road to Cleaner Air: Improvements for sustainable transportation* at p. 5. December 2020. https://www.lgc.org/wordpress/wp-content/uploads/2020/12/clean-mobility-factsheet.pdf

[4] California Air Resources Board. *California Greenhouse Gas Emissions for 2000 to 2019: Trends of Emissions and Other Indicators* at p. 12. July 2021. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf

[5] California State Transportation Agency. Climate Action Plan for Transportation Infrastructure (CAPTI). Appendix A: Implementation Strategies & Actions Matrix. July 2021. https://calsta.ca.gov/-/media/calsta-media/documents/capti-2021-calsta.pdf

[6] California Air Resources Board. *Mobile Source Strategy* at p. 110.

including both sector specific and holistic reviews of jurisdictions' efforts to support statewide climate standards that will be outlined in the 2022 Scoping Plan.

We appreciate your consideration of our comments and the work to complete the Mobile Source Strategy as CARB takes on the Scoping Plan and State Implementation Plan in 2022. We look forward to working with you to ensure all California communities are healthy and sustainable for all residents. Please contact Will Barrett with the American Lung Association for any additional information at William.Barrett@lung.org.

Sincerely,

Will Barrett
National Senior Director, Clean Air Advocacy
American Lung Association

Kate Wright
Executive Director
Local Government Commission