

May 10, 2019

Fran Inman, Chair
California Transportation Commission
1120 N Street MS 52
Sacramento, CA 95814

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

Subject: Threats to California Clean Car Standards and Clean Air Act Authority

Dear Chair Inman and Commissioners and Chair Nichols and Board Members:

On behalf of the American Lung Association in California, I am writing to voice our appreciation of the California Transportation Commission (CTC) and California Air Resources Board (CARB) convening a discussion of the many negative consequences of federal government's misguided efforts to rollback highly effective vehicle emission standards and revoke California and other states' authority to protect their citizens from harmful pollutants.

Both CTC and CARB have critical roles in reducing transportation pollution to protect public health. As your agencies enter this important conversation, we would like to share the following resources specific to the public health rationale for opposing this federal proposal.

State of the Air 2019

On April 24, 2019, the American Lung Association released the 20th annual *State of the Air* report documenting local air pollution progress and challenges across the United States. Despite decades of progress, California communities remain highly impacted by ozone and particle pollution. The significant gains documented over the 20 year history of the report are attributable to Clean Air Act policies, including California's more health-protective emissions standards. *State of the Air 2019* specifically references the attack on the clean cars program and California's authority as a key threat to clean air:

*Under the Clean Air Act, California has the right to establish its own emission standards for cars and trucks. Other states have the option of adopting California's standards, and many have done so. California's ability to set more protective emissions standards has helped drive lifesaving reductions in harmful pollution from vehicles nationwide; maintaining this authority is critical.*¹

Health Opposition to Cleaner Car Rollbacks and Threat to California Authority

As noted in the *State of the Air* report, nearly 100 health and medical organizations have stated their strong opposition to this federal threat to clean air progress. The attached letter documents the health concerns, particle and climate pollution impacts and specific impacts to our most vulnerable communities due to the federal proposal. We draw your attention to this passage summarizing the concerns of scores of health and medical organizations across the United States:

No rational basis exists for curtailing advancement of vehicle technologies that reduce harmful levels of emissions, fuel consumption and consumer costs. The proposed standards will lead to the consumption of an additional half million barrels of oil a day, raising direct health impacts associated with criteria air pollutants and carcinogenic toxic emissions for communities already most impacted by the “upstream” pollution associated with the extraction, transportation and refining of petroleum products, and creating an overall increase in particle pollution as compared to the existing standards in 2025 and beyond.²

We encourage you to consider these resources during this important discussion and to call on the American Lung Association as a partner in protecting public health in California.

Sincerely,



Will Barrett
Clean Air Advocacy Director

¹ American Lung Association. *State of the Air 2019: Seven Threats to the Nation's Air Quality*. April 24, 2019. www.lung.org/sota; <https://www.lung.org/our-initiatives/healthy-air/sota/key-findings/seven-threats.html>

² American Lung Association, et al. *Letter from Public Health Organizations Opposing the Proposed “Safer Affordable Fuel-Efficiency Vehicles Rule”* October 26, 2018. <http://www.lung.org/assets/documents/advocacy-archive/letter-from-health-orgs-cars.pdf>

