



July 6, 2016

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California Department of Transportation
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Subject: Public Health Community Comments on Sustainable Freight Action Plan

Dear Chairman Nichols:

On behalf of the undersigned health and medical organizations and individuals, we are writing to urge the State of California to move forward with a strong, multi-agency, plan to reduce the harms caused by the freight sector. We applaud Governor Brown's leadership in issuing his Executive Order directing state agencies to develop the Sustainable Freight Action Plan. We view this process as a vital element of protecting the health of Californians' air and our global climate.

California is home to the greatest air pollution in the United States, largely due to freight and other transportation sources. Overwhelming evidence shows that freight pollution can kill. Particle pollution can increase the risk of heart disease, lung cancer, and asthma attacks and can interfere with the growth and work of the lungs. The American Lung Association's 2016 *State of the Air* report found that over 80 percent of Californians live in areas with unhealthy air. Major goods movement regions (in the South Coast and San Joaquin Valley) are among the most impacted in the United States by ozone and particle pollution. The Air Resources Board's current estimate is that the freight sector is responsible for \$20 billion in health damages annually in California, including 2,200 premature deaths and 1,300 emergency room visits and hospitalizations each year. Lower income communities and communities of color often

experience these preventable health burdens in a concentrated dose because diesel pollution hot spots (major highways, rail yards, freight depots, and ports) are located in and near their neighborhoods.

We strongly support the advanced technology vision for the freight plan utilizing “zero emission equipment everywhere feasible, and near-zero emission equipment powered by clean, low carbon renewable fuels everywhere else.” This over-arching vision is key to public health progress. We also encourage the final vision to include a clear goal to promote community health and equity, and to ensure these concepts inform all actions moving forward. In that spirit, we also recommend that the plan be strengthened in the following ways to ensure that healthy, sustainable communities can thrive in California free from freight pollution burdens as this sector grows:

1. ***Strengthen targets for freight electrification and efficiency included in the plan.*** The call for 100,000 zero emission vehicles and equipment by 2030 does not reflect the urgent need for rapid transformation in the freight sector and should be increased to spur greater investment and direction to a broad scale transition away from fossil-fueled freight systems. A clean air future in California requires zero emission technologies to be widespread across all transportation sectors, especially freight. We also recommend that the greenhouse gas efficiency target in the plan be strengthened to ensure widespread transition to a sustainable system occurs beyond business as usual.
2. ***Give higher priority to multi-agency actions aimed at eliminating health impacts of the freight sector, especially in communities disproportionately impacted by freight.*** The Plan should include specific goals and criteria to eliminate freight pollution hot spots within a reasonable timeframe and clearly highlight the urgency of reducing community health impacts caused by the freight sector. While goods movement benefits are shared broadly, the public health impacts of diesel hot spots are typically concentrated among lower income communities and communities of color near major ports, railyards, freight corridors and distribution centers.
3. ***The Plan should provide for a clear cap on facility emissions.*** The draft Plan must go beyond its calls for data collection at existing freight hubs, and provide direction for working with local air districts to establish emissions caps for facility emissions. Such caps will protect the public and avoid increased pollution burdens caused by freight hubs.
4. ***We urge all state agencies to align funding sources to support implementation of the plan and the demonstration, deployment and commercialization of zero emission technologies.*** Incentive funds and other state funding should work to support zero emission technologies, including through the installation of appropriate infrastructure and pilot projects targeted to alleviate health impacts in our most impacted communities first.

Moving forward, the state should ensure that a strong regulatory component supports all aspects of the plan. For example, the state should implement regulations for zero emission freight technologies and low-NOx trucks and urge the federal Environmental Protection Agency to move forward with national standards for low-NOx trucks. The state should employ all available measures to reduce emissions from rail, marine and other freight systems impacting the health of Californians. A wide range of incentive and grant funds are also necessary to support the Freight Plan, but a strong regulatory framework is necessary to ensure the transition to zero emission technologies as quickly as possible.

In closing, we believe that the Governor's Executive Order on Freight, and the multi-agency Sustainable Freight Action Plan mark a historic opportunity to improve and protect the health of all Californians. We look forward to working with the Administration to ensure a final Plan takes advantage of the opportunity and momentum to creating a more sustainable and healthy economy.

Sincerely,

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American Cancer Society – Cancer Action Network

Bonnie Holmes-Gen, Senior Director, Air Quality and Climate Change
American Lung Association in California

Jamie Morgan, Senior Legislative Director
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Individuals

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