



February 26, 2021

Dr. William A. Burke, Chair  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

via email: [clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov)

### **Support for Warehouse Indirect Source Rule**

Dear Dr. Burke and members of the Governing Board:

On behalf of the American Lung Association, we are writing to provide comments in support of the adoption of a strong Indirect Source Rule by the South Coast Air Quality Management District. We appreciate the work you, District staff and stakeholders have put into ensuring community health protections through clear targets for reducing ozone-forming emissions from indirect sources. As the rulemaking continues, we respectfully urge the District to act quickly to adopt the strongest possible rule.

In large part due to the transportation sector, including trucks serving warehouses throughout the region, the American Lung Association's annual [State of the Air](#) 2020 report found that the Los Angeles metropolitan area is the most ozone-polluted region in the United States, and among the most impacted by particle pollution. Too many communities face a significant number of days with unhealthy ozone or particle pollution levels that contribute to a wide range of health impacts, including asthma attacks, heart attacks and strokes, lung cancer and premature deaths. We are deeply concerned with the disparities that exist in exposures to transportation pollution which often fall most heavily on lower-income communities and communities of color nearest major trucking routes, warehouses and other diesel hotspots, as well as with workers impacted at these sites. Fortunately, decades of policy innovation has spurred significant progress in reducing harmful emissions and we look to the district to continue to build on this foundation.

Now, a strong Indirect Source Rule for warehouses is urgently needed to protect public health from the growing pollution impacts of major warehouse operations throughout the region. We believe the district should strengthen the final rule to ensure that the greatest possible emission reductions and health protections are required. We encourage the district to move forward as rapidly as possible, and to elevate the role and requirements for zero-emission

trucks serving warehouses to help provide critical air quality relief for the impacted communities and warehouse industry workers. The American Lung Association's 2020 [Road to Clean Air](#) report found that the greater Los Angeles Area could experience the greatest public health benefits in the nation through a widespread transition to zero-emission transportation, including over \$14 billion in annual public health benefits, more than 1,200 fewer deaths and 16,000 asthma attacks due to cleaner air. The Indirect Source Rule represents an important opportunity to reduce local pollution impacts, advance zero-emission transportation, and provide meaningful health protections for heavily impacted communities and workers within the region.

We look forward to working with the district to continue the important progress made and taking on the challenging work ahead to ensure clean, healthy air for all residents, especially for those most burdened by heavy trucking pollution today. Please don't hesitate to reach out Steven Jimenez at [steven.jimenez@lung.org](mailto:steven.jimenez@lung.org) with any questions.

Sincerely,

Karen Jakpor, MD  
Health Professional Volunteer

Afif El-Hasan, MD  
Health Professional Volunteer

Frances Mojica  
Executive Director, Los Angeles

