

February 22, 2021

Craig Duehring, Manager  
California Air Resources Board  
Mobile Source Control Division  
1001 I Street  
Sacramento, CA 95812

**Subject: Advanced Clean Fleets Rulemaking**

Dear Mr. Duehring,

As volunteer leaders and Executive Directors of the American Lung Association in Los Angeles, San Diego and the San Francisco Bay Area, we write to express our strong support for the California Air Resources Board (CARB) efforts to implement the zero emission transportation measures outlined in Governor Newsom's Executive Order N-79-20. Within this effort, the Advanced Clean Fleets (ACF) rule is a critical early action in support of achieving our health-protective clean air and climate standards through the widespread transition to heavy-duty zero-emission transportation in California.

Through the Lung Association's annual [State of the Air](#) reports, we know that the communities where we work are among the most polluted in the United States, and we know that the transportation sector is a dominant source of our ozone and particle pollution burdens. We also know low-income communities and communities of color nearest our ports and port trucking routes are disproportionately exposed to toxic pollution and face elevated risks of lung and heart health impacts. Because port operations represent major, localized pollution sources impacting vulnerable populations in our communities, we welcome CARB's priority focus on the full transition to zero-emission port drayage trucks by 2035.

At its core, Governor Newsom's direction to fully transition the drayage truck fleet to zero emissions by 2035 is a public health and health equity measure. As with the [Advanced Clean Truck](#), [Low NOx Truck](#) and [Ships at-Berth](#) regulations that we strongly supported in 2020, we are working closely with our advocacy division to prioritize the ACF rule in 2021 as a critical pathway to reducing health impacts in the most disadvantaged communities. The initial drayage truck proposals by CARB staff include important indicators that robust near-term actions are being considered. As this process moves forward, we encourage staff to:

- Prioritize and accelerate the benefits of zero-emission technologies in communities most affected by port trucking and other freight operations;
  - CARB should endeavor to provide detailed health benefit information on the drayage fleet rule (and across the Advanced Clean Fleet rule) including monetized and non-monetized costs and both qualitative and quantitative health impacts analysis to the greatest extent possible, including illustration of benefits projected to accrue in disadvantaged communities.
- Ensure only zero-emission trucks are eligible to be added to the drayage registry starting in 2023 as proposed so that the full transition is on schedule for 2035 at the latest;

- Set clear limits that trucks meeting full useful life guidelines (800,000 miles or a maximum of 18 years from certification) shall no longer be compliant with CARB’s drayage truck registry, as proposed;
  - CARB should also apply these full useful life parameters across the full ACF rule to ensure the retirement of the oldest/dirtiest legacy fleets throughout California;
- CARB should ensure that ACF compliance costs sit with fleet operators rather than with drivers designated as independent contractors; and
- CARB should continue to work with sister agencies to target and increase vehicle and infrastructure incentive funding to accelerate the benefits of zero-emission in California’s most disadvantaged and pollution-impacted communities.

The benefits of the transition to zero emission transportation cannot be understated. The American Lung Association’s 2020 “[Road to Clean Air](#)” report illustrated the immense public health benefits - as much as \$22 billion annually in California - as cars, buses, trucks shift from combustion to sustainable, healthy zero-emission technologies. We are encouraged by the adoption of several key regulations last year by CARB and the direction set by Governor Newsom to eliminate combustion emissions in the trucking sector as rapidly as possible.

We look forward to continued engagement in this effort and encourage you to contact the American Lung Association’s Director of Clean Air Advocacy, Will Barrett, with any questions at (916) 585-7663 or [William.barrett@lung.org](mailto:William.barrett@lung.org).

Sincerely,

Carrie Nash  
Executive Director, San Francisco

Rita Redaelli,  
Executive Director, San Diego

Frances Mojica  
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Will Barrett  
Director, Clean Air Advocacy

***Volunteer Leaders***

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