



December 10, 2019

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

Subject: Support for Strengthening Advanced Clean Trucks Rule

On behalf of the undersigned organizations committed to healthy California communities, we are writing to express our support and recommendations for the California Air Resources Board (CARB) for strengthening the proposed Advanced Clean Trucks rule. We support the direction of the rule as an important opportunity to advance zero emission trucks to protect our health and our environment.

California is home to the most difficult air pollution challenges in the United States. According to the American Lung Association's *State of the Air* 2019 report, over 90 percent of Californians live in counties impacted by unhealthy air, and California cities dominate the lists of most ozone- and particle-polluted cities in the United States.¹ The transportation sector is the leading source of harmful air pollutants that threaten the health of Californians. Diesel particulate matter is a known carcinogen and contributes to harmful respiratory, cardiovascular and other negative health outcomes. These burdens are often concentrated in lower-income communities with major, local sources of diesel pollution such as ports and warehouses. Transportation pollution is also the leading contributor to climate change that threatens our progress on cleaning up the air, and exacerbates a wide range of public health risks. This rule will help reduce the risk of respiratory, cancer, cardiovascular and other health impacts.

It is critical to develop healthier transportation solutions to alleviate air pollution and climate burdens.

Fortunately, advances in both battery-electric and fuel-cell-electric technologies can transform the trucking industry if public policy sets the right standards. Our organizations support the stated intent of the proposed ACT rule:

*"The purpose of the Proposed ACT Regulation is to accelerate the widespread adoption of zero-emission vehicles (ZEVs) in the medium-and heavy-duty truck sector and reduce the amount of harmful emissions generated from on-road mobile sources."*²

However, we believe that the rule must be far more ambitious to establish a stronger and earlier deployment signal to manufacturers and fleet operators to meet this challenge. We appreciate the opportunity to submit comments in support of strengthening the proposal to improve and protect public health through a stronger rule:

Set a more stringent manufacturer standard. The proposal currently aims at requiring tens of thousands of zero emission trucks across all weight classes. Given the urgency of the air and climate challenges facing Californians, and the rapid development of the zero emission truck sector, we urge CARB to set the rule to require trucks in the hundreds of thousands range by 2030. A stronger rule will help to address the long-term impacts of growth in goods movement and vehicle miles traveled projected in the coming decades,³ with reductions in fine particle pollution and greenhouse gas emissions leveling off in 2040. The dismissal of a stronger standard on the basis of "scarcity"⁴ of deployments in certain sectors is precisely why the rule should be stronger from the start, and should include all vehicle types. The goal of the standard should be to prompt manufacturers to take zero-emission technology that already is or soon will be available and incorporate it into their products sooner than they would under a business-as-usual scenario.

Accelerate development of the fleet rule. We look forward to working with CARB and stakeholders in the development of a strong fleet requirement for zero emission trucks. We encourage CARB to pull this rule forward to support greater certainty for the deployment of larger quantities of zero emission trucks being required under the rule.

Specify target dates for 100 percent zero-emission technologies by truck sector. Within recent rules adopted by CARB, there have been clear target dates set for the transition to zero emission technologies for specific vehicle types (e.g. 100 percent transition of airport shuttles by 2035, 100 percent transit buses by 2040). CARB staff have indicated a target for 100 percent of delivery

¹ American Lung Association. *State of the Air*. April 2019. www.stateoftheair.org

² California Air Resources Board. *Proposed Advanced Clean Truck Regulation. Initial Statement of Reasons*. p. E-S1. Oct. 2019. <https://ww3.arb.ca.gov/regact/2019/act2019/isor.pdf>

³ CARB. ACT-ISOR at pp. V-I 3-4.

⁴ CARB. ACT-ISOR, Appendix D. *Draft Environmental Analysis*. P.124. Oct. 2019. <https://ww3.arb.ca.gov/regact/2019/act2019/appd.pdf>

trucks to be zero emission by 2040,⁵ and similar goals should be outlined for additional truck categories under the ACT rule.

Include all truck categories in the rule from the start. Currently, the staff proposal excludes certain pick-up trucks from the requirements until 2027, while other truck categories – including the heaviest classes – are included beginning in 2024. We believe that all classes of trucks should be included in the rule from the start to ensure all categories are being built out on zero emission platforms to support attainment of clean air and climate standards. Pick-up truck requirements should be included in the rule for 2024.

Model a strong rule for other states. There is no question that the policies adopted by California resonate across the United States. We encourage CARB to strengthen the proposed rule to demonstrate to other states that the ACT rule will have a significant impact on the deployment of zero emission trucks in their jurisdictions' ability to achieve clean air and climate benefits. For example, the Connecticut Department of Energy and Environmental Protection is looking to California for a strong standard to drive the market, noting in the draft zero emission vehicle roadmap issued in October 2019:

“Continued movement by regulators and industry toward medium- and heavy-duty fleet electrification will be driven by California’s Advanced Clean Truck regulations... If Connecticut intends to secure the environmental benefits afforded by electrification of significant numbers of medium- and heavy-duty vehicles, then the state will need to put promulgate regulations to adopt California’s standards...”

Follow through on State Implementation Plan and Scoping Plan commitments to achieve health-based air quality and climate standards. CARB included the ACT concept (then known as the Last Mile Delivery Standard) in both the 2016 State Implementation Plan to ensure additional mobile source emission reductions in support of ozone and particle pollution standards⁶ and within the Scoping Plan for greenhouse gas reduction measures.⁷ In order to achieve California’s clean air and climate standards to protect public health, SIP commitments and Scoping Plan measures must be adopted as quickly as efficiently as possible.

The current ACT rule proposal will save lives and avoid significant health impacts in communities most impacted by diesel truck emissions, and we support this direction. Because of the carcinogenic, cardiovascular, respiratory and other health impacts of diesel particle pollution, we urge the Board to accelerate and bolster these health benefits by aiming higher with a rule that will deploy hundreds of thousands of zero emission trucks and set the stage for the widespread transition to zero emissions as quickly as possible.

We look forward to the discussion of this critical rule, and to continue working with CARB members, staff and other stakeholders to implement the strongest possible standards to reduce harmful pollution in California.

Sincerely,

⁵ CARB. ACT-ISOR at p. E-S1.

⁶ CARB. Revised Proposed 2016 State Strategy for the State Implementation Plan p. 72. 2017. <https://ww3.arb.ca.gov/planning/sip/2016sip/rev2016statesip.pdf>

⁷ CARB. California’s 2017 Climate Change Scoping Plan. 2017. p.103, Table 17. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

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