



September 27, 2021

Craig Duehring, Manager
In-Use Control Measures Section
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Advanced Clean Fleets Rulemaking Workshop

Dear Mr. Duehring:

On behalf of the American Lung Association, we are writing in response to the Advanced Clean Fleets (ACF) rulemaking workshop hosted by the California Air Resources Board (CARB) on September 9, 2021. The transition away from combustion to zero-emissions vehicles (ZEVs) is a high priority for the American Lung Association, and we believe CARB should tighten several elements of the rule to accelerate and capture the significant benefits of ZEV truck technologies.

As CARB stated during the workshop, California has the worst air quality in the nation and, therefore, the most to gain by significantly reducing emissions from the transportation sector. In fact, the American Lung Association's [State of the Air 2021](#) report found that California is home to seven of the ten most ozone-polluted cities in the United States and six of the ten most impacted by particle pollution. These pollutants can impact Californians' daily lives and cause a wide range of adverse health impacts. Exposure to ozone and particle pollution can contribute to asthma attacks, heart attacks and strokes, and thousands of premature deaths annually in California. Children, seniors, people living with heart and lung disease, lower-income communities and communities of color face increased risks. Too many communities face local, immediate impacts from high concentrations of truck traffic at ports, railyards, warehouses and other high-traffic areas. The ACF is an important leverage point for generating major public health and air quality benefits for California's most impacted and vulnerable populations.

To address these health burdens and disparities in exposures and negative health outcomes, CARB must prioritize communities with heavy pollution burdens caused by the trucking sector. By implementing the most stringent rule and expanding the reach of important provisions already proposed, CARB can accelerate community-level and statewide benefits of ZEV trucks while also reducing the impacts of the legacy fleet. The American Lung Association's 2020 [Road to Clean Air](#) report found that California could achieve \$22 billion in annual health benefits - avoiding 1,900 premature deaths, 26,000 asthma attacks and 122,000 lost workdays annually - due to the widespread transition to zero-emission transportation. We offer the following recommendations for the ACF rule to accelerate these benefits:

Accelerate Proposal: 100 Percent ZEV Truck Sales Target

We appreciate CARB staff proposing a 2040 all-ZEV requirement, but believe that CARB should establish a 100 percent ZEV truck sales rule no later than 2036 for all vehicle

classes. Accelerating the 100 percent sales target supports Governor Newsom's Executive Order N-79-20 direction for all zero-emission operations by 2045 where feasible, and tracks with CARB's Mobile Source Strategy modeling. By making this amendment to the rule, CARB can ensure that progress under the Advanced Clean Trucks regulation continues to the full transition to zero-emission sales as rapidly as possible.

Expand Proposal: Drayage Definition

The proposal currently targets the turnover of all trucks in the Drayage Truck Registry (DTR) to zero-emissions by 2035, and calls for trucks to visit ports or railyards at least once per year. This is a critical component of the rule, but fails to address a significant swath of California trucks not entering ports and railyards, or required to register. Ultimately, trucks performing similar operations but not operating within the ports or railyards would not be subject to these provisions despite contributing to poor air quality in highly polluted and disadvantaged communities. This effectively omits such trucks operating in the two most polluted regions in the United States according to the American Lung Association's *State of the Air* 2021 report: Inland Empire counties rank as the most ozone-polluted places in America; the San Joaquin Valley dominates the list of most impacted by particle pollution. If this provision is not expanded, we are concerned that these communities will ultimately wait longer to transition to zero-emissions, therefore, delaying the health benefits of this regulation.

Expand Proposal: Truck Retirement

CARB should expand the useful life retirement proposals beyond the drayage and "non-compliant" priority fleet requirement to all trucks operating in California. Any truck in the fleet that meets the useful life provisions outlined in Senate Bill 1 (2017) should no longer be eligible to operate in California. This framework for truck retirement is included in the proposal, but the limited scope allows the continued operation of older, higher-polluting trucks in California far beyond the useful life provisions outlined in state law and within the ACF proposal. We recommend staff model the emissions reductions benefits of a full, fleetwide truck retirement program and incorporate this provision in the final ACF rule.

Broadly, we appreciate and support the work the California Air Resources Board and staff are doing to spur the transition to zero-emission trucks, which we view as critical to achieving our clean air and climate standards. We look forward to continuing conversations and opportunities to strengthen the Advanced Clean Fleet rulemaking to improve lung health for all Californians. Please contact Will Barrett at william.barrett@lung.org for additional information.

Sincerely,

Will Barrett
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