



December 9, 2019

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

Subject: EHC Support for Strengthening Advanced Clean Trucks Rule

Dear Chair Nichols and Members of the California Air Resources Board:

Environmental Health Coalition (EHC) is a 40-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

On behalf of Environmental Health Coalition's members, Board, and staff, I urge your support of an Advanced Clean Truck Rule that includes the following essential elements.

- (1) Increases the overall mandates to ensure that by 2030 no less than 15 percent of medium and heavy-duty trucks on the road are ZEV;
- (2) Includes Class 2b pickup trucks in the mandates beginning in 2024;
- (3) Outlines CARB's longer-term objectives for achieving 100% zero-emission trucks in various categories, and explains how this phase of the rule is consistent with those objectives in attaining federal and state air quality and greenhouse gas objectives; and
- (4) Commits to adopt corresponding fleet purchase requirements in 2021.

### **Why San Diego Needs a Strong Advanced Truck Rule: Environmental Justice**

Diesel particulate matter is the number one air pollutant in the San Diego region and in environmental justice communities.

**Regionwide.** Regionally, 90% of the diesel particulate emissions come from mobile sources. Heavy duty trucks are a large contributor to these emissions.

**Portside.** San Diego's AB 617 Portside communities of Barrio Logan/Logan Heights/Sherman Heights, and west National City are adjacent to Port cargo terminals, freeways, waterfront industry, and a BNSF railyard. In addition to the goods movement and industrial truck traffic, many businesses within these mixed-use communities generate truck traffic in the form of delivery trucks. All these sources of diesel pollution affect air

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quality and the health of residents. Portside communities also rank high on the CalEnviroScreen overall and for diesel. Barrio Logan, in fact, ranks in the top 5% statewide on the CalEnviroScreen diesel indicator and the asthma indicator as well. Preliminary Aclima data from spring of 2019 showed a higher proportion of black carbon to total PM<sub>2.5</sub> in the vicinity of Perkins Elementary School in Barrio Logan than further north, suggesting a higher health hazard to these residents and schoolchildren from a similar amount of particulate matter.

**San Ysidro/Otay.** The San Ysidro/Otay Mesa communities that border Mexico host two of the world's busiest border crossings, the San Ysidro crossing and the Otay Mesa truck crossing. Otay truck crossings are increasing every year. Northbound truck crossings increased from 800,000 in 2008, before the recession, to almost 1,000,000 in 2018. (Source: SANDAG Committee on Binational Regional Opportunities May 2019. "2018 San Diego-Baja Border Crossing and Trade Highlights.") Preliminary Aclima black carbon data from the Otay Mesa area, taken during the spring, 2019, months of March through June, showed an average level of 1.89  $\mu\text{g}/\text{m}^3$  and a maximum concentration of 6.78  $\mu\text{g}/\text{m}^3$  black carbon. These figures correspond to cancer risks of 575 and 2061 cancers per million, respectively, using the OEHHA cancer unit risk factor for diesel PM.

**El Cajon.** The west El Cajon area also ranks high on CalEnviroScreen and also has high PM and diesel PM levels.

### **Why San Diego Needs a Strong Advanced Clean Truck Rule: NO<sub>x</sub> Reduction**

Per preliminary modeling completed in 2017, a reduction of 22.8 tons/day of NO<sub>x</sub> emissions is needed in order to reach attainment for the 2015 national ozone standard (70 ppb). A 26% reduction in NO<sub>x</sub> mobile source emissions would achieve this.<sup>1</sup> It is clear that a significant reduction in heavy duty truck emissions will be needed in order to achieve the 2015 ozone standard in our region. A rule that will result in only 4% of the trucks on the road being ZEV by 2030 will not be adequate.

### **Local Efforts To Reduce Truck Impacts on Communities**

EHC and our community leaders, working with the City of San Diego, the San Diego Air Pollution Control District, and the Port of San Diego, are doing everything we can locally to reduce truck impacts:

- Working with the City to establish and enforce truck routes;
- Working with the Port to educate truck drivers on the new route;
- Working through the Portside communities Clean Air Protection Program (AB 617) to incentivize cleaner trucks in our communities;
- Pursuing a decades-long effort to reform the land use plans in these communities to better separate industrial from residential land uses.

However, local efforts cannot compel a faster industrywide shift to electric trucks and away from diesel. We need action at the state level to require zero-emission trucks in California at the earliest possible date.

### **A Stronger ACT is Feasible**

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<sup>1</sup> [https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/AB\\_617/SDAPCD\\_Community\\_Monitoring\\_Nominations.pdf](https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/AB_617/SDAPCD_Community_Monitoring_Nominations.pdf)

We know a faster shift to ZEV is feasible. Other commenters have provided extensive analysis of the options for a faster phase-in of zero emission trucks. Locally, we know that a large portion of the truck traffic going through and around our portside communities consists of trucks visiting the Port's cargo terminals. A Port estimate from a year ago is that about 28% of the total Port-related truck trips are 50 miles or less. Another large percentage travels routes of less than 200 miles, to the Los Angeles-Long Beach area or up to the San Bernardino area. Electric trucks that can drive these distances already exist, and are being deployed in demonstration projects today. It is important to make sure they are fully commercialized and available to truck fleets to purchase over the next decade.

### **Recommendation**

**We join clean freight activists throughout California in asking the California Air Resources Board (CARB) to adopt an Advanced Clean Truck (ACT) rule that will result in 15% of heavy-duty trucks on the roads by 2030 being zero emission.**

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Joy Williams". The signature is written in a cursive, flowing style.

Joy Williams

Research Director