September 12, 2022

California Air Resources Board

Byron Sher Auditorium

1001 I Street

Sacramento, California 95814

**Coalition for Clean Air Comments on the Proposed 2022 State Strategy for the State Implementation Plan**

California is home to the most polluted air in the United States. Air pollution causes a wide range of health impacts, including asthma attacks, heart attacks, strokes, lung cancer and thousands of premature deaths annually in California. Pollution threatens the health of all Californians, but especially those in our most disadvantaged communities and communities near ports, railyards, warehouses and other major trucking routes.

The 2022 State Strategy for the State Implementation Plan (SSSIP) needs to provide a map toward delivering healthy air to all Californians. We appreciate all the hard work that went into the proposal and look forward to collaborating with CARB on implementing many of the measures. At the same time, we think it important to point out that the proposal is unlikely to bring the South Coast and San Joaquin Valley regions into attainment with national ambient air quality standards.

Achieving clean air will require concerted action by CARB, the federal government and the air districts. We strongly agree with the statement that “For California to meet air quality standards, it is imperative that the federal government act decisively to reduce emissions from primarily-federally regulated sources of air pollution, including interstate trucks, ships, locomotives, aircraft, and certain categories of off-road equipment.” Unfortunately, we can not say with confidence that the federal government will in fact fulfill its duty to take those actions.

**Zero Emissions Trucks Measure**

Heavy-duty trucks are responsible for over half of smog- and particle forming emissions despite representing only three percent of the vehicles on California roads. Diesel exhaust is a toxic air contaminant containing dozens of carcinogens and is often concentrated in low-income communities and communities of color. Recent CARB estimates indicate that nearly 145,000 trucks would be considered gross polluters under the planned Heavy-Duty Inspection and Maintenance program as vehicles age and emission controls deteriorate over time.

Requiring the retirement of old heavy-duty diesel trucks is probably the single biggest step that CARB could take to reduce air pollution and improve lung health in California. Adopting such a measure would require no additional statutory authority; only willingness by the Board to take this life-saving step. Therefore, we appreciate the inclusion of the Zero Emissions Trucks Measure in the SSSIP, in response to suggestions from the public, and we recommend some improvements to maximize its effectiveness.

*How Does State Law Define “Useful Life?”*

Section 43021 of the Health and Safety Code, enacted by SB 1 in 2017, intends to provide “certainty about the useful life of engines.” The provision prohibits CARB from requiring the retirement, replacement, retrofit, or repower of heavy-duty trucks until they have reached at least 13 years of age and then reach either 800,000 miles or 18 years, whichever comes first. This definition of useful life was *de facto* sponsored by the California Trucking Association. However, nothing currently requires heavy-duty trucks to be removed from operation at the end of their useful life.

*What are the benefits of retiring old trucks?*

1. Combustion engines and emission controls degrade as mileage and time accumulate, so older fossil fuel trucks almost always emit more per mile than younger ones;
2. Before 2013, heavy duty trucks did not have on-board diagnostics (OBD), which means their emission controls are not as robust and excessively polluting trucks will not be identified as well by CARB’s proposed Inspection and Maintenance rule, which will rely heavily on OBD;
3. All new trucks sold from 2024 onward will have to meet stronger NOx standards from the Heavy-Duty Omnibus (HDO) rule. Mandated retirement will shrink the overall pool of pre-2024 diesel vehicles; and
4. Mandating retirement will provide more opportunities for the deployment of cleaner technologies and enable better planning by providing more certainty on truck turnover. For instance, the upcoming Advanced Clean Fleets rule would drive an increasing number of purchases of zero emission (ZE) trucks. New entrants to the Drayage Truck Registry would have to be ZE from 2024 on.

*The Timetable for the Zero Emissions Trucks Measure Should be Accelerated*

The measure in the proposal would potentially come before the Board in 2028, go into effect in 2030, and could follow one of two pathways. Given the urgency of our air pollution crisis, the Board should take action sooner, because all of the 2010 trucks will have reached the end of their useful lives by 2028.

**Therefore, we recommend that CARB decide by the end of 2024 which option it will pursue, with the Board acting no later than 2026 so that the rule can be implemented by 2028.** The statewide NOx reductions of 14.3 tons per day make this measure one of the most significant in the SSSIP, and we cannot afford to delay or equivocate in implementing the measure.

Respectfully Submitted,

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Coalition for Clean Air