

December 9, 2019

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

RE: Support for a stronger Advanced Clean Trucks rule

Dear Chair Nichols and Board Members,

We the undersigned scientists from California and across the country with expertise in air quality, health, and transportation emissions urge the California Air Resources Board to adopt the strongest possible Advanced Clean Trucks (ACT) rule.

We are concerned about the longstanding negative impacts of truck emissions on public health and the environment, and support transitioning toward zero-emissions technologies. The transportation sector is the largest emitter of global warming pollution in both California and the United States, and heavy-duty vehicles are disproportionately polluting.¹ Heavy-duty vehicles make up only 7 percent of vehicles in California, yet are responsible for 20 percent of global warming emissions, 40 percent of NO_x emissions, and 27 percent of PM_{2.5} emissions from the transportation sector.²

Diesel emissions from trucks have significant negative impacts on human health. Studies have shown air pollution increases the risk of asthma, heart attacks, cancers, premature death and more.³ California communities continue to experience the nation's worst air quality.⁴ For example, in the California South Coast Air Basin, ozone levels have exceeded the 2015 national 8-hour standard (0.070 ppm) for more than 120 days each of the last four years.⁵ Truck pollution disproportionately harms communities of color located near busy roads and freight hotspots.⁶ In setting the first zero-emissions truck standard in the country, California must create a strong precedent for improving public health and air quality.

The ACT rule must also consider the climate impacts of heavy-duty vehicles. In an era when carbon emissions must be drastically reduced to combat climate change, and California has mandated greenhouse gas reduction targets of 40 percent below 1990 levels by 2030 via Senate Bill 32, global warming emissions from heavy-duty vehicles in California have shown no decline over the last six years. Studies such as the Intergovernmental Panel on Climate Change (IPCC) special report from 2018 highlight the urgency for deep emissions reductions to minimize the worst effects of global warming.

CARB's current proposal would result in zero-emissions vehicles comprising only 4 percent of trucks on California roads by 2030. To improve air quality and reduce California's contribution to global warming, **we urge CARB to commit to sales standards that would lead to a significantly higher proportion of zero-emissions trucks on the road by 2030.**

We believe it is critical to transition the heavy-duty transportation sector from its reliance on diesel to zero-emissions technologies as soon as possible. Thank you for considering our recommendation.

Sincerely,
The Undersigned

1. California Air Resources Board. 2019. California Greenhouse Gas Inventory for 2000-2017. ww3.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scoping-plan_sum_2000-17.pdf (b) U.S. Environmental Protection Agency. 2019. Sources of Greenhouse Gas Emissions. <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>

2. Chandler, S., J. Espino, and J. O'Dea. 2016. Delivering opportunity: How electric buses and trucks can create jobs and improve public health in California. Cambridge, MA: Union of Concerned Scientists. www.jstor.org/stable/resrep17234

3. American Lung Association (ALA). 2019. State of the air. www.lung.org/assets/documents/healthy-air/state-of-the-air/sota-2019-full.pdf

4. Id.

5. California Air Resources Board. 2019. Last Year's (Annual) Ozone Summaries for Selected Regions (PST). https://www.arb.ca.gov/aqmis2/ozone_annual.php

6. Reichmuth, D. 2019. Inequitable Exposure to Air Pollution from Vehicles in California. Cambridge, MA: Union of Concerned Scientists. www.ucsusa.org/sites/default/files/attach/2019/02/cv-air-pollution-CA-web.pdf

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