

April 27, 2023

California Air Resources Board  
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Sacramento, CA 95814  
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Re: California mothers and allies urge you to approve the ACF rule without delay

Dear Chair Liane Randolph and Commissioners:

Mothers Out Front is a national movement of mothers and allies mobilizing for a healthy environment today and a livable climate for all children. On behalf of our 6,200 California supporters, we urge you to act without delay to approve the Advanced Clean Fleets (ACF) rule at your meeting this week.

This common-sense measure is essential to improve our air quality, protect public health, and achieve our climate goals. Most importantly, it's needed to ensure environmental justice for the millions of Californians who live in heavily-polluted and heavily-trucked areas, disproportionately located in communities of color and low-income communities.

Make no mistake: adopting the ACF rule is vital to protect these communities and all Californians. Big trucks are the state's number one source of smog-forming emissions, according to [CARB's own analysis](#). As Yale explains, by replacing diesel and gas-guzzling big rigs, [electric trucks can save lives](#).

We understand that you are being asked by industry lobbyists (including the trucking industry, major automakers, Western States Petroleum Association) to change the proposed ACF rule by delaying when it takes effect or weakening the requirements. These groups clearly have a vested interest in prolonging our dependence on fossil fuels and on old internal combustion engines. Instead of perpetuating the use of diesel- and gas-powered trucks, the Alliance for Automotive Innovation should support true innovation—in electric truck technology.

We also understand that you have been lobbied by hydrogen proponents to allocate additional funding for "clean fuels" like hydrogen. Please keep in mind that given the enormous expense of creating green hydrogen (using one form of energy to make another form of energy is inherently inefficient), 98% of the currently available hydrogen is produced by fossil fuels. These fossil fuels are not zero emissions, so it's a misnomer to classify hydrogen-powered vehicles as "zero emissions." Don't focus only on pollution from tailpipes—also consider the pollution generated by the extraction, refining, transportation and use of fossil fuels and the large amounts of methane that leak at every stage.

It is also inherently unfair to use the tax dollars of California residents—who have been hammered by devastating climate impacts like floods, blizzards, and wildfires—to prop up a technology (nonrenewably-produced hydrogen) that exacerbates the climate crisis. Given that our state's electricity will be zero-carbon by 2045, CARB should focus on the electrification of all types of vehicles and not prop up hydrogen fuel-cell vehicles which wouldn't be able to compete without handouts from government.

Therefore, we mothers and allies ask you—for the health of our children and communities and for the stability of our climate—to adopt staff's proposed ACF rule without delay or dilution or carve outs. We are counting on you to see through the well-paid lobbyists' fear-mongering and hydrogen hype and do the right thing for our communities.

In solidarity for environmental justice and a just transition,

Alicia Nichols Gonzales, California Organizing Manager (and San Diego resident)  
Mothers Out Front California

Andrea Slater, Senior Community Organizer (and Vallejo resident)  
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