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SUMMARY of PROPOSED AMENDMENTS TO ADVANCED CLEAN TRUCKS REGULATION

Though CARB's stated goal in the proposed regulation is zero-emission heavy-duty trucks, we suggest by adding low NOx trucks to the strategy, CARB would ensure deeper penetration of the state's heavy-duty fleets with advanced clean air technologies. Doing otherwise will leave diesel in charge of the heavy-duty sector for another decade.

1. The ACT Regulation—rather than only impacting 15% of the class 7 and 8 sales market by 2030—could potentially achieve 25-50% market penetration as early as 2025 by including class 7 and 8 low NOx trucks with renewable fuel that meet or beat a 0.02 g/bhp-hr NOx standard. This would overachieve with the current projected emission reductions sought by the Regulation. This could occur by adding a partial credit for heavy-duty low NOx trucks.
2. Credit generation would continue to exist, allowing manufacturers to offset zero tailpipe vehicle manufacturing sales requirements, up until CARB implements a new heavy-duty emission standard for internal combustion engines that meets or exceeds a .02 g/bhp-hr NOx standard. This could be closed if and when it is determined that the heavy-duty ZEV market has adequately matured in cost, performance, infrastructure and availability metrics.
3. The proposed ACT Regulation artificially restricts the definition of "near-zero" to only "plug-in hybrids with some all-electric range," purposely omitting low NOx vehicles. There's a long history of low NOx vehicles being included verbally or in writing in the definition or "near zero" including in state statutes and with regional air districts and state agencies including CARB.