



November 7, 2022

Chair Randolph and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Support for Proposed Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation

Dear Chair Randolph and Members of the Board:

The Coalition for Clean Air supports adoption of the proposed In-Use Off-Road Diesel Regulation Amendments, with no weakening changes, because they will save lives and reduce illness. These amendments are necessary because Californians continue to suffer from the worst air quality in the nation by far. Many off-road engines emit unacceptable levels of toxic diesel exhaust into our communities.

The Benefits of the Proposed Rule are Substantial, and Far Outweigh the Costs

ARB staff estimate that the proposed Off-Road Amendments would reduce statewide emissions by approximately 31,087 tons of NO_x and 2,717 tons of PM above expected reductions from the current regulation on the books. Between 2024 and 2038, the proposed Off-Road Amendments will result in the following health benefits:

- 571 fewer premature deaths;
- 82 fewer hospital admissions for cardiovascular illnesses;
- 98 fewer hospital admissions for respiratory illnesses; and
- 277 fewer emergency room visits for asthma.

Statewide, the value due to avoided health outcomes would be \$5.74 billion. And, importantly, half of these benefits would occur in the first five years of the rules implementation. The benefits far outweigh the projected costs of \$1.9 billion.

The Proposed Amendments are Reasonable and Feasible

The proposed amendments would accomplish a gradual phase-out of the oldest dirtiest engines by setting dates after which the lowest tiers would be banned, and would use vehicle adding requirements to assure that replacement equipment adheres to cleaner standards.

We also support the requirement to use renewable diesel in all fleets from 2024 on. Renewable diesel is a functionally equivalent substitute for petroleum diesel that reduces both

criteria air pollutants and greenhouse gas emissions. Its use is particularly beneficial in engines that do not have diesel particulate filters. Flexibility would be allowed if renewable diesel is unavailable, but availability is unlikely to be a problem.

California Badly Needs the Emission Reductions from this Proposed Rule

Emission reductions from upgrading off-road diesel engines will be significant and timely, as large air districts continue to struggle with attaining national ambient air quality standards. Staff project reductions in NOx of 6.4 tons per day, and in particulate matter of .68 tons per day, in 2025. These early reductions will help our residents breathe healthier air, and are counted on in the State Strategy for the State Implementation Plan that the Board adopted in September.

For all these reasons, we urge you to adopt the proposed rule without delay or weakening.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director