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Sharon Landers

**INTERIM
EXECUTIVE OFFICER/APCO**

October 14, 2022

Chairperson Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA

Re: Support for the Advanced Clean Fleets Regulation

Dear Chairperson Randolph:

Thank you for the opportunity to comment on the proposed Advanced Clean Fleets (ACF) Regulation. The requirements for large companies, drayage truck operators and government fleets to phase-in zero emission trucks will help the Bay Area reach and maintain the Federal and State ambient air quality standards, continue moving us in the right direction for achieving needed greenhouse gas (GHG) reductions, and further reduce exposure to toxic air contaminants within heavily impacted neighborhoods. The Bay Area Air Quality Management District staff strongly supports this regulation and urges the Board to adopt it.

We commend CARB staff in proposing a regulation that focusses on reducing emissions from the medium- and heavy-duty trucks operating within or near local communities. Drayage and yard trucks are significant sources of diesel PM in AB 617 communities like West Oakland and Richmond that border seaports and railyards; public and delivery fleets operate trucks near residences; large fleets of heavy-duty trucks are a significant fraction of the oxides of nitrogen emissions responsible for ozone pollution. We support the requirement that a truck be replaced upon reaching its industry standard useful life. This requirement, coupled with the requirement beginning in 2024 that only zero emission trucks can be added to covered fleets or in drayage service, is key to ensuring the timely buildout of needed refueling infrastructure.

We also support the inclusion of yard trucks in the proposed ACF regulation rather than in a future revision to the Cargo Handling Equipment regulation. Yard trucks are among the largest sources of diesel PM emissions from the Port of Oakland and railyards. Zero emission yard trucks, unlike other cargo handling equipment, are currently commercially available, and share design and technology with drayage trucks.

Because of the critical near-term need to reduce exposure to diesel pollution in heavily impacted communities, Air District staff supports the continued use of incentives for the early deployment of the zero emission trucks and related infrastructure. Local air districts and CARB have jointly administered the Carl Moyer Air Quality Standards and Attainment Program (Moyer) in partnership since 1998, successfully accelerating the deployment of cleaner engine technologies. We appreciate the changes made to the Program in 2021, however additional updates to the current guidelines will ensure the Program remains a well-designed, efficient resource for individual truck owners and fleets. As a result, in parallel with the initial implementation of this rule, we request that CARB staff work with air districts in expediting updates to the Carl Moyer Program Guidelines.

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Additionally, the incentive programs available from State agencies have grown out-of-balance, competing for applicants, and often having conflicting and burdensome requirements. It is critical that CARB continue to collaborate with stakeholders to review the State's incentive portfolio and change eligibility rules to make programs complementary. This will help maximize state incentive funding and improve administrative efficiency. The existing strong collaboration between CARB and local air districts is a proven means for efficiently deploying commercially available zero emission technologies; the growing partnerships between the AB 617 communities, CARB, and local air districts provides a means for ensuring equitable funding in areas where early compliance is critically needed. Maintaining and enhancing these partnerships should be a key part of any State financial assistance for early compliance with the proposed control measure.

In closing, I would like to express my appreciation for CARB's continuing efforts to reduce the air quality and health impacts from trucks operating in California. The Air District is committed to supporting your efforts by providing early compliance assistance through incentives and coordination with our AB 617 communities. I look forward to our ongoing collaboration.

Sincerely,

A handwritten signature in blue ink that reads "Sharon Landers". The signature is fluid and cursive, with the first name "Sharon" and last name "Landers" clearly distinguishable.

Sharon Landers
Interim Executive Officer/APCO

cc: Members, BAAQMD Board of Directors
Dr. Stephen S. Cliff, Executive Officer, CARB