



October 17, 2022

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Strengthen the Advanced Clean Fleet Rule to Promote Health and Equity

Dear Chair Randolph and Board Members:

On behalf of the American Lung Association, we are writing to express our support for the Advanced Clean Fleet rule and to call for the Board to adopt a stronger final rule to increase the rule's benefits to health, equity and emission reductions throughout California. The rule represents a critical clean air and public health intervention, especially in communities most impacted by harmful pollution from medium- and heavy-duty trucks. The rule's drayage truck schedule and retirement elements, the focus on public and private fleets and the establishment of a 100 percent zero-emission truck sales requirement are strong foundations for adopting a more health-protective final rule.

The American Lung Association "[State of the Air](#)" reports continue to show that Californians face the most difficult air pollution burdens in the United States and that climate change is amplifying a wide range of health risks. Our research also underscores that California communities have the most to gain from the shift to zero-emission transportation ("[Zeroing In on Healthy Air](#)", March 2022), and especially zero-emission trucks ("[Delivering Clean Air](#)", October 2022). CARB must seize the opportunity to reduce disparities in pollution exposures caused by combustion trucks in drayage and other settings, and must strengthen the rule to bring life-saving benefits to our most impacted and vulnerable communities sooner. We call on CARB to:

Strengthen the Proposal

As noted in the staff analysis of Alternative 2, setting a stronger rule in place for the final ACF will increase the benefits of the rule by a wide margin – saving thousands of additional lives and reducing the suffering in communities facing the highest levels of truck traffic. We join with our partners in the health community calling for a stronger rule bringing in key elements of the Alternative 2 scenario. Specifically, we call on CARB to:

- Move the 100% zero-emission truck sales requirement to 2036 from 2040.
- Shift sleeper cabs into Group 2 of the High Priority Fleets to align all Class 7 and 8 tractor requirements with a starting date in 2027 rather than 2030. CARB must also lower the priority fleet threshold for Class 7 and 8 tractors from fleets of 50 trucks down to fleets of 10 to ensure that the requirements cover more of California's truck fleets.

Meet CARB's Clean Air Commitments

The shift to zero-emission fleets and setting a 100 percent sales standard for zero-emission trucks as envisioned by the ACF rule honors the clean air the commitments made through the

Advanced Clean Truck rule (2020) and the 2022 State Implementation Plan adopted by CARB in September of 2022. In fact, the ACF rule is among the three most effective policies in terms of NOx emission reductions included in the 2022 SIP — CARB has clearly acknowledged that the ACF is vital to achieving health-protective clean air standards. We applaud the Board's attention in the SIP to making the robust shift to zero-emission, non-combustion technologies as broadly and quickly as possible and believe that the approved ACF must reflect that direction. US EPA and CARB have each acknowledged that combustion technologies produce more harmful emissions in the real world than they are certified to and demonstrates the needed shift to zero-emission technologies included in the SIP and central to the ACF.

Capitalize on Infrastructure Opportunities

The ACF will require the integration of increasing numbers of zero-emission trucks over time, largely starting later this decade and ramping up through the following decade. This gradual shift from combustion fuels to zero-emission fuel, including to California's power grid, is vital to achieving clean air standards and will require the strong coordination between CARB and sister agencies that has been demonstrated throughout many of CARB's rulemakings. Further, unprecedented state and federal investments provide important support to hasten the shift to zero-emission trucking and support grid reliability. Billions in investments in zero-emission vehicle purchases, zero-emission fueling infrastructure and the overall growth in the trucking market pushed by CARB's own policies and investments — in addition to substantial private investment - all point to successful implementation of the rule and savings in fueling cost for fleet operators.

Lead the Way to Zero-Emissions

California must continue to lead the way on policies that eliminate combustion to protect its citizens; reverse decades of policies that have put low-income communities and communities of color in harm's way; and ensure the pathway to a stable climate. California is also a beacon for states looking to accelerate the fight for clean air. Whether Advanced Clean Cars or the Advanced Clean Truck rule, California's leadership has been bolstered by states taking immediate actions to accelerate healthy air. Setting strong zero-emission technology policies like the ACF that can truly protect health in communities facing unbearable levels of toxic truck pollution in California and throughout the nation.

The American Lung Association calls on CARB to strengthen the ACF rule to make the most of this opportunity for lung health, health equity and a healthy climate. We look forward to working with the Board and staff to bring the benefits of healthy air to all California communities to eliminate disparities in pollution burdens posed by combustion trucks.

Sincerely,

Will Barrett
National Senior Director, Clean Air Advocacy

Mariela Ruacho
California Manager, Clean Air Advocacy