



October 6, 2022

Steven S. Cliff, Ph.D  
Executive Director  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Dr. Cliff:

As our name indicates, environmental justice is our top priority. Climate change poses an existential threat to life on earth, and the effects of air pollution disproportionately affect people of color. The mission of the Environmental Justice League is to raise awareness of environmental impacts on our diverse communities and seek solutions to ensure that historic injustices are not repeated. We fulfill our mission by advocating for environmental-justice for communities of color in rule-making and legislative proceedings.

Diesel-powered heavy-duty trucks are the single largest source of smog-forming pollution and toxic air contaminants in California, especially in the federal non-attainment areas of the South Coast and San Joaquin Valley air basins. The ramifications of these contaminants are acutely felt among the environmental-justice communities that are often located near freeways. Our mostly African American membership is greatly concerned that we will continue to bear the brunt of underinvestment and a deprioritizing of our needs.

Unfortunately, the California Air Resources Board draft “Advanced Clean Fleets” rule thus far could be more accurately called the “Default to Diesel” rule.

Why? Unfortunately, the deployment of Zero Tailpipe Emission trucks has been slower than all of us want. That has forced the Air Resources Board to

propose phasing the Clean Fleets rules. The question thus becomes: What happens in the meantime? What do we tell the parents of children along busy transportation corridors? Do we doom another generation to asthma, increased cancer rates, and learning disabilities, all which are byproducts of dirty air?

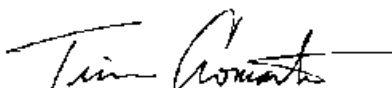
For the Clean Fleets rule to be truly, “advanced,” it should have a requirement that if a Zero Tailpipe Emission Vehicle is not available at any given time, a truck should utilize the cleanest possible engine available. Otherwise, fleets will continue to be largely diesel, while we wait for Zero Tailpipe Emission trucks to be more widespread.

We applaud the fact that the proposed rulemaking does not favor one clean technology over the other. The fact is: for families, particularly with children of color that live in impacted communities – we don’t care whether our air gets cleaner with hydrogen, hybrid electric, renewable gas, or some new fuel blend, as the world waits for true ZEVs. Families in our communities just want their air to be better, and promptly.

We ask the Board to require fleets granted a “ZEV Unavailability Exemption” to purchase the cleanest available vehicles (certified to 0.02g NOx). Only then can the Board claim to have ridden our communities of the highest-polluting diesel vehicles. The Board should also protect and reward the fleets that acted early to adopt vehicles that reduce short-lived climate pollutants. Otherwise, you risk hurting the very entities that care about communities of color and who put their money where their rhetoric is.

We are encouraged by the growing recognition that there is an infrastructure gap. We respectfully urge the Board to prioritize the needs of environmental-justice communities. You must require local governments and commercial carriers to purchase vehicles with the cleanest technology available at any given time. This is a necessity given the phased-in approach. The perpetuation of diesel technology into the second half of this century must be avoided at all costs.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Cromartie", followed by a horizontal line.

Tim Cromartie  
Executive Director