



May 28, 2020

Mary Nichols, Chair
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95819

Subject: Support for Adoption of Advanced Clean Trucks Policy

Dear Chair Nichols and Members of the Board,

On behalf of the undersigned organizations dedicated to improving the health of all Californians, we write in strong support of the California Air Resources Board adopting the proposed Advanced Clean Trucks (ACT) standard at the June hearing. [In our prior comments on the ACT](#), we called on the Board to strengthen the initial rule proposal. Now, we write in support of the current proposal as being responsive to the need to ensure greater public health and climate protections through the deployment of greater volumes of zero emission trucks.

Californians face significant air pollution and climate change challenges, and these burdens fall disproportionately on our most vulnerable residents. The American Lung Association’s State of

the Air 2020 report found that almost all Californians are impacted by unhealthy air at some point during the year, and that California is home to 7 of the 10 most ozone-polluted cities in the United States. Transitioning off of harmful transportation fuels is a critical step to protecting local communities from truck exhaust and ensuring that our most vulnerable and heavily impacted residents benefit from the transition to zero emission technologies as quickly as possible.

The Proposed ACT rule supports this transition through increasing levels of zero emission technologies across the truck fleet in California between 2024 and 2035. The proposal will generate deep reductions in harmful pollutants, yield significant health benefits in California and beyond, and especially to California communities most directly impacted by heavy truck traffic.

Health benefits of the rule are substantial, but incomplete. Approximately \$9 billion in avoided health impacts are projected due to the more robust proposal now under consideration. It is important to note that these benefits reflect a portion of the actual health benefits that would be generated through this rule in terms of additional health impacts and associated costs that are not captured in the health benefits analysis. An important discussion of the limits on CARB's health evaluations and quantifications was held before the Board at the April 23 hearing, noting that many pollutants and health endpoints are not captured in rulemaking analyses. These substantial benefits remain a conservative estimate of the full suite of benefits to be gained through adoption and implementation.

The proposed rule reduces particle pollution for decades. The updated proposal overcomes the projected growth in truck VMT and associated increases in carcinogenic fine particle emissions over the coming decades. (The prior proposal estimated that particle emissions would eventually rebound with growth projections for the truck sector.) As stated in Appendix C ([Benefits Analysis, p. 4](#)): "...emission reductions associated with ZEVs cancel out the expected PM2.5 increases associated with growth." The proposal offers lasting protections against toxic diesel particulate matter, a critical environmental justice benefit of this proposal.

Call for earlier action on Fleet Purchase proposal. We encourage the Board to continue to work towards an earlier adoption of the forthcoming fleet purchase requirement and are encouraged with the staff's early work on this proposed rulemaking. We support complementing the manufacturer ACT rule with fleet requirements as soon as possible to ensure an early and robust deployment and certainty for success.

ACT rule compliance must not reduce benefits in other CARB programs. Compliance with the ACT rule must not be allowed to diminish effectiveness of other rules CARB is pursuing to reduce harmful pollution from the trucking sector. Early deployment or over-compliance with the ACT rule would be appropriate metrics for linking between rules, but must be carefully considered to ensure each rule delivers the greatest possible real-world health and climate benefits, and double-counting is not allowed.

The widespread and rapid transition to zero emission transportation wherever possible offers significant health, air quality and climate change benefits. We view the ACT rule as transformative and critically important to protecting and improving public health for decades to come.

We urge you to adopt the rule and look forward to working with the board and staff to continue to seek solutions to benefit the health of all Californians.

Sincerely,

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