



BreatheSoCal.org

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October 17, 2022

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

RE: Strengthening the Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph:

Breathe Southern California (BSC) greatly appreciates the opportunity to provide comments on the California Air Resources Board (CARB) proposed Advanced Clean Fleets (ACF) rule. As you are aware, the ACF rule is part of a collection of state actions to not only accelerate deployments of zero-emission vehicles (ZEV) but also to achieve statewide carbon neutrality by 2045. These actions will also have a profound effect on public health throughout California. The goals of the state strongly align with the goals of BSC; however, we encourage CARB to strengthen its proposal to ensure that the adoption of this rule can maximize public health benefits.

Breathe Southern California is an environmental health nonprofit organization located in Los Angeles, California. Our mission is to promote clean air and healthy lungs through education, research, technology, and advocacy. We are committed to promoting community health services primarily through prevention, education, and early diagnosis for low-income and underserved individuals suffering from respiratory-related chronic conditions, including asthma, lung disease, and chronic obstructive pulmonary disease.

We believe the ACF rule is critically important for improving air quality and addressing public health disparities throughout the state. Diesel trucks are well-known emission sources of diesel particulate matter (PM), volatile organic compounds (VOCs), nitrous oxides (NOx), sulfur dioxide (SO₂), and greenhouse gases.

These emission sources disproportionately impact low-income communities and communities of color throughout the state, who often live near freight and transportation hubs. As emissions from the freight industry continue to rise, we need bold action to ensure we improve public health and address air quality, environmental justice, and climate emergencies.

Breathe Southern California strongly supports the ACF rule, specifically Alternative 2, with the following changes:

1. Move the 100 percent MHD ZEV sales date from 2040 to 2036.

2. Further reduce emissions from highly emitting Class 7 and 8 tractors by:
 - a. Moving Class 8 Sleeper Cabs from Group 3 to Group 2 vehicles in the High Priority Fleets Rule so that all Class 7 and 8 tractors are subject to the same transition schedule beginning 2027 (instead of 2030); and
 - b. Lowering the High Priority Fleet threshold for Class 7 and 8 tractors from 50 to 10 trucks.

Additionally, while we understand compliance exemptions are necessary, we believe that CARB should require the utilization of the best available technology when issuing these exemptions. Specifically, if a fleet is using the “ZEV Unavailability Exemption,” CARB should require following the Omnibus Regulation as a safety net to ensure that the best available technologies are still being utilized. This would only allow fleets to purchase vehicles certified to the 2027 0.02g NOx Omnibus standard during the calendar years 2024-2026, thereby ensuring public health benefits are considered when purchasing vehicles using the exemption.

We thank you for the opportunity to provide feedback and look forward to the decision of the Board.

Sincerely,


Marc Carrel
President & CEO