



August 12, 2020

Mary Nichols
Chair
California Air Resources Board
1001 I Street Sacramento, CA 95814

Submitted electronically via rulemaking docket

RE: Support for The Proposed Heavy-duty Engine and Vehicle Omnibus Regulation and Associated Amendments (a.k.a. Low-NOx Rule)

Dear Chair Nichols and Members of the Board:

At the December 2019 and June 2020 CARB Board hearings on the Advanced Clean Truck rule, we heard public testimony from group after group of citizens in front line, environmental justice and community health organizations from throughout the state retelling their personal and family stories of suffering from the effects of toxic air pollution in diesel death zones. We must do everything possible to mitigate this health tragedy as soon as possible.

We believe that by the time the Low-NOx rule begins to go into effect in 2024, a broad portfolio of cost-effective zero-emission medium- and heavy-duty trucks will be available to meet the needs of truck owners and operators and that a zero-emission truck path is the best for pollution reduction.

However, to the extent that new fossil-fueled vehicles continue to be manufactured and sold until the industry transitions to 100% zero emission and they soon become relics of the past, CARB must ensure that they produce the very lowest NOx, PM 2.5 and other toxic pollutants possible.

CARB has documented that based on research from the Southwest Research Institute and confirmation from the Manufacturers of Emission Control Association, that technology for significantly lowering these emissions from diesel drivetrains is available today and that further reductions will be available by the 2027 model year.

The incremental costs to realize these benefits is very small compared with the economic and health benefits. According to the ISOR, "... the Proposed Amendments would help California to attain the national air quality standards for ozone and PM and thus benefit the health of California's residents. The health benefits have been monetized by year for the Proposed Amendments in Table V-4 to be \$36.8 billion over the 29-year timeframe of the Proposed Amendments from 2022 to 2050 due to the reduction in premature mortality, hospitalizations, and emergency room visits. The

monetized health benefits of the Proposed Amendments, \$36.8 billion, offset the total cost of the Proposed Amendments, \$4.49 billion¹, many times over.”

We applaud CARB and support its amendments aimed to increase the length of time for warranties and periodic inspections to ensure that these vehicles maintain their real-world emissions reductions requirements over their expected lifetimes on the road.

Further, we note that many other states and jurisdictions from across the nation are looking to CARB to enact this rule so they can model it locally to address their similar air quality challenges especially in light of delayed action for a national standard from the EPA. (Please see the presentation from the Northeast States for Coordinated Air Use Management (NESCAUM²))

While Sierra Club California must continue to focus on and do everything we can to support the transition of medium- and heavy-duty trucks to zero-emission vehicles, we support this omnibus rule as a necessary interim step to minimize transportation emissions until the zero-emission transition occurs.

Sincerely,

Sierra Club California
Katherine Garcia, Communications Associate
Ray Pingle, Lead Volunteer on Clean Transportation

¹ <https://ww3.arb.ca.gov/regact/2020/hdomnibuslownox/isor.pdf> page IX-70

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https://ww2.arb.ca.gov/sites/default/files/classic/msprog/hdlownox/files/workgroup_20190926/guest/02_nescaum_presentation_carb_workshop.pdf?_ga=2.228818908.1171005005.1596994292-918008978.1552949808