



April 7, 2023

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

Re: Support for Advanced Clean Fleets and Implementation Comments

Dear Chair Randolph and Board Members:

On behalf of the American Lung Association, I write in support of the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) rule and urge the Board to adopt this life-saving measure without delay. The ACF rule has the potential to provide significant relief from toxic air pollution burdens, especially for frontline communities most impacted by diesel trucking emissions across California. We encourage CARB to adopt the rule, and to continue to monitor implementation and coordination of this rule within CARB's suite of heavy-duty vehicle policies.

Need for Zero-Emission Truck Fleets

California is home to the most polluted air in the nation, with 98 percent of the population living in a community impacted by unhealthy air according to our "State of the Air" 2022 report. Our report also notes that California cities dominate the lists of the most polluted American cities in terms of ozone and particle pollution. Breathing unhealthy air contributes to a wide range of negative health consequences, including asthma attacks, heart attacks and strokes, worsening of chronic illness, increased susceptibility to respiratory infection, premature birth and low birthweight, as well as premature death. Breathing particle pollution can cause lung cancer, and diesel particulate matter is a known carcinogen. These health burdens often fall disproportionately to lower-income Californians and people of color, as well as on workers regularly exposed to these pollutants. As the leading source of harmful emissions in California, all transportation sources – and especially medium- and heavy-duty vehicles – must shift to zero-emissions as rapidly as possible.

Strengths of the ACF Proposal

Addressing these burdens and disparities requires CARB leadership in accelerating the transition to zero-emissions for medium and heavy-duty fleets. We applaud CARB for maintaining the ACF proposal with strong attention to the drayage truck fleet turnover to zero-emissions and for including a 100 percent ZEV medium- and heavy-duty truck sales requirement by 2036 within the final proposal. These steps will support cleaner air and reduced diesel exhaust exposures among workers and community members as CARB implements and enforces this program. In short, lung health will be much better protected against harmful emissions when the ACF is in place.

Major Health Benefits to be Gained

There are significant health benefits that could through the implementation of the ACF rule. The reduced NO_x and particle pollution could save over 2,500 lives. In addition, the ACF proposal will result in 1,177 avoided emergency room visits and over 800 avoided hospitalizations for cardiovascular and respiratory illnesses. CARB's analysis shows the cumulative public health

benefits of the implementation of the proposed ACF rule could reach \$26.5 billion. We remain concerned that the final proposal leaves open the possibility for extended use of combustion technologies in some use cases, and that the far greater health benefits possible if the rule were applied to lower fleet sizes identified in the Standard Regulatory Impact Analysis will not be realized. Still, we write in support of the adoption of the proposed Advanced Clean Fleet rule as a vital step forward in public health protection.

Coordinating Implementation of California Truck Standards

As CARB moves beyond the approval of this critical rule, we strongly encourage the Board to act quickly to ensure alignment of the ACF rule, the Advanced Clean Trucks (ACT, 2020) rule and the “Zero Emission Truck” rule included in the 2022 State Strategy for the State Implementation Plan. This will mean 2035 ACT manufacturer sales requirements and the ACF 2036 sales proposal align, and that the Zero Emission Truck rule works to ensure that the oldest, high-polluting trucks are retired from service upon reaching useful life standards. Combined, the ongoing implementation of these rules will save thousands of lives and prevent significant suffering throughout California, especially within the State’s most vulnerable and over-burdened communities and among workers exposed to harmful diesel exhaust.

The American Lung Association supports the proposed ACF rule, and we look forward to working with the Board and staff to advance the health protections possible through this and other critical California truck emission standards. Please contact me with any questions at William.barrett@lung.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "William Barrett", is positioned above the printed name.

Will Barrett

National Senior Director, Clean Air Advocacy