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December 6, 2019

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

RE: Support for a Stronger Advanced Clean Trucks Rule

Dear Chair Nichols and Members of the Board:

On behalf of BREATHE California of Los Angeles County, I appreciate the opportunity to comment on the California Air Resources Board (CARB) Advanced Clean Trucks (ACT) Draft Proposed Regulation (Proposed Regulation). I commend you for developing a Proposed Regulation that strives to reduce diesel pollution from heavy-duty trucks. Still, there is an opportunity for the Proposed Regulation to better and further address the issue of diesel pollution.

Diesel is a major cause of health problems related to pollution. As your website states:

“Diesel exhaust...contains more than 40 cancer-causing substances, most of which are readily adsorbed onto the soot particles. In 1998, California identified diesel PM as a toxic air contaminant (TAC) based on its potential to cause cancer. Other agencies, such as the National Toxicology Program, the U.S. Environmental Protection Agency and the National Institute of Occupational Safety and Health, concluded that exposure to diesel exhaust likely causes cancer. The most recent assessment (2012) came from the World Health Organization’s International Agency for Research on Cancer ...[which] led to the conclusion that diesel engine exhaust is “carcinogenic to humans,” thereby substantiating and further strengthening California’s earlier TAC determination.” See <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>

The adverse health impacts of diesel exhaust cannot be ignored. The leading source of smog-forming particles in Southern California is heavy-duty diesel vehicles. Diesel includes over 40 substances listed as hazardous air pollutants by your agency. It is estimated that 70 percent of total known cancer risk related to air toxins in California is attributable to diesel particulate matter (DPM). In addition to the cancer risk, DPM exposure can lead to other health problems including asthma, chronic obstructive pulmonary disease (COPD), and exacerbations for those with COPD. But still, more than two decades after designating diesel PM as a TAC, your agency estimates that diesel PM contributes to approximately 1,400 premature deaths from cardiovascular disease annually in California.

The Proposed Regulation does not go far enough in reducing the number of heavy-duty diesel vehicles on California roads. It is estimated that under the rule, in 2030, only four percent of heavy-duty trucks on California roads will be zero-emission. What will fuel the other 96 percent of trucks? Are you resigned to having the vast majority of trucks a decade from now continue to

emit harmful diesel exhaust for our children to breathe? It is imperative that the ARB must do what it can to end diesel now.

We propose that the Proposed Regulation align with a commitment made by Governor Newsom in December 2017 to have “zero diesel pollution by 2030.” As such, we recommend that the ARB, through the Proposed Regulation, take the lead to phase out, and ultimately eliminate, the use of diesel fuel in the state by 2030 and promote their replacement with cleaner-fueled vehicles of all vehicle classes. Diesel is causing disease and death, and unless it is removed, it will continue to threaten public health to Californians. We urge your agency to take the lead and end diesel now so that all Californians can finally breathe easier.

Should you have any questions regarding this letter, please feel free to contact me at (323) 935-8050 x250 or at MCarrel@breathela.org. Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'M. Carrel', is written over a light gray rectangular background.

Marc Carrel

President & CEO

BREATHE California of Los Angeles County