



August 26, 2020

Mary D. Nichols, Chair, and Board Members
California Air Resources Board
1001 I Street Sacramento, CA 95814

Re: California Air Resources Board Proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments

Dear Chair Nichols and Honorable Board Members:

Thank you very much for inviting Colorado to provide comments on this rulemaking. Transportation emissions in Colorado, as in many other places, are a major source of greenhouse gas emissions, ozone precursors and particulate matter. Colorado is deeply concerned about both the climate impacts of these emissions and the public health effects of poor air quality, especially during a respiratory health crisis. Governor Jared Polis has prioritized addressing economy-wide emissions through a varied set of strategies. As part of this effort, the Colorado Department of Transportation, the Department of Public Health and Environment, and the Energy Office have worked closely together to identify opportunities to increase transportation electrification and reduce vehicle miles travelled.

Last summer, [Colorado adopted the zero emission vehicle standard](#), building on several years of efforts to support light duty ZEV adoption in the state. Colorado was the first state in a decade to do so, also the only state to do so with support from auto manufacturers, and opened the door for a new set of states to consider joining the standard. Of course, this is just one step in a long and challenging process to convert and clean up Colorado's fleet.

This January, the Denver metro region was downgraded to serious ozone nonattainment, and we are quickly approaching a severe designation. Of course, poor air quality in our dense urban areas disproportionately impacts our most vulnerable communities, and Colorado is determined to find solutions. Pollution from vehicles is the largest single source of NOx and one of the largest sources of volatile organic compounds (VOCs), the two precursors to ozone formation.

Over the past five years, Colorado has committed over \$26 million to fund charging stations, electric and renewable natural gas freight, transit, and school bus replacements, and school bus retrofit projects throughout the state. We also have passed legislation requiring utility investment in light and heavy duty charging, and our largest utility has proposed \$100 million in investment over the next three years.

That's why we're excited about the development of a [clean truck strategy](#), which we announced, in partnership with our major fleet association, earlier this summer. Colorado's clean truck strategy will take a holistic look at strategies to reduce emissions from heavy-



duty vehicles. Colorado also joined the multi-state Memorandum of Understanding to work collaboratively to advance the market for electric trucks and buses.

All three agencies are committed to a collaborative stakeholder dialogue regarding development of a balanced approach to clean trucking, including evaluation of the following strategies:

- Accelerating opportunities for fleet turnover within the conventional truck fleet, including diesel emissions reduction strategies. Cleaner Low-NOx medium and heavy duty vehicles from California's rules and manufacturers would enhance the impact of these efforts;
- Developing infrastructure to support zero emission vehicles in medium and heavy duty fleets;
- Exploring opportunities for major fleets to transition to zero emission vehicles; and
- Exploring potential adoption of Advanced Clean Truck standards. Colorado is beginning an analysis into the benefits and challenges of joining the program, as well as potential regulatory flexibilities that may be allowable under the Clean Air Act, should Colorado pursue rulemaking.

Colorado looks forward to continuing this state dialogue, and we are holding our first of a series of public meetings at the same time as today's hearing. California's work is helping to inform the tools available to other states. Colorado is the most recent state to exercise its right under Section 177 of the Clean Air Act to adopt both LEV standards in 2018 and ZEV standards in 2019. As I mentioned, we are evaluating potential adoption of Advanced Clean Truck standards. Given our ozone challenges, we are very interested in the potential for more protective NOx standards for trucks, and we appreciate CARB's leadership in setting standards that will help promote cleaner and more efficient trucks.

Sincerely,



Shoshana Lew
Executive Director, Colorado Department of Transportation



Will Toor
Executive Director, Colorado Energy Office



John Putnam
Director of Environmental Programs, Colorado Department of Public Health and Environment

