



October 27, 2022

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

RE: **National Support for the Advanced Clean Fleets Rule**

Dear Chair Randolph and California Air Resources Board Members,

We, the undersigned environmental, environmental justice, business, and health organizations representing members throughout the nation urge the California Air Resources Board (CARB) to direct Staff to adopt the Advanced Clean Fleets (ACF) rule in the strongest form possible. As leaders in the fight for clean air, climate justice, and the rights of all workers, we strongly urge the Board to adopt a modified version of the Advanced Clean Fleets regulation that accelerates the 100% sales target to 2036 and cuts emissions from high-polluting Class 7 and 8 tractors.

States and communities across the country are counting on California's leadership to clean up pollution from diesel trucks. The ACF rule is vital to addressing air quality, climate, and environmental justice crises within our communities by requiring a portion of medium- and heavy-duty (MHD) vehicle fleets to transition to zero-emission vehicles (ZEVs). It provides a logical next step to the Advanced Clean Trucks (ACT) rule that many states have already adopted, and would continue to support our own efforts to clean up diesel pollution across the country. California's proposed ACF rule would propel MHD ZEV sales over the next 20 years, generating massive economic, public health, and environmental benefits for California, while paving the way for the rest of the nation to adopt similar standards.

People who live near freight hubs or "diesel death zones"—including ports, highways, warehouses, and rail and intermodal yards—are disproportionately exposed to high concentrations of pollution from the combined activity of diesel-fueled heavy-duty trucks, equipment, rail, and vessels. Countless studies show that diesel-powered vehicles emit fine particulate matter (PM<sub>2.5</sub>) and nitrogen oxides (NO<sub>x</sub>), which lead to numerous adverse health outcomes and even premature death. For decades, low-income communities and communities of color located near freight hubs, bus depots, and trucking corridors have been directly and disproportionately affected by the cumulative impacts of air pollution and GHGs from transportation and other emissions sources

MHD vehicles represent only six percent of the on-road vehicles across the country, but generate 59 percent of ozone- and particle-forming NO<sub>x</sub> emissions and 55 percent of the particle pollution.<sup>1</sup> Over 72 million Americans live in close proximity to freight trucking routes and are exposed to significant tailpipe emissions from combustion vehicles.<sup>2</sup> Ozone and particle forming emissions from these vehicles are directly linked to severe health impacts including heart disease, lung cancer, and respiratory infections. As emissions from freight continue to rise across the country, it is imperative that we act to secure clean air for our communities. Additionally, heavy-duty trucks and buses are also a major source of climate-warming

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<sup>1</sup> American Lung Association. Zeroing in on Healthy Air. March 2022. [www.lung.org/ev](http://www.lung.org/ev)

<sup>2</sup> United States Environmental Protection Agency. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2020, EPA 430-R-21-005. <https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-1990-2020-data-highlights.pdf>

greenhouse gas (GHG) emissions, accounting for 30 percent of GHG emissions across the nation.<sup>3</sup>

While the Clean Air Act preempts every state except California from establishing motor vehicle emissions standards that are more stringent than U.S. federal standards, states may “opt-in” to California’s standards. California therefore serves as a leader on air quality and climate change for not only Section 177 states, but also for the nearly 20 states that are party to the [Multi-State ZEV Task Force](#). These states have identified several CARB policies as part of their [action plan](#) for driving down transportation emissions, including recommending adoption of the ACF. These states recognize that California’s regulations are necessary to transition their fleets to ZEVs. We are relying on CARB and California’s leadership on this issue in order to make an impact within our own geographies.

By adopting the strongest ACF rule possible, California can continue to catalyze the MHD ZEV market, and allow other states to follow suit in transitioning to ZEVs. Zero-emission technologies help protect frontline communities against harmful truck emissions. It is critical CARB adopts the strongest rule possible, including accelerating the 100% ZEV sales target to 2036, and cleaning up the highest polluting Class 7 and 8 tractors.

As organizations and communities across the nation, we are grateful for CARB’s leadership on sensible clean truck standards that will pave the way for adoption outside of California. Many elements of the current proposal are sufficiently strong and must be retained, particularly the drayage and public fleet requirements and the commitment to only allow zero-emission technology for compliance. Despite these strong elements, more can and should be done. We look forward to CARB adopting the strongest ACF rule possible.

Sincerely,

Patricio Portillo  
Senior Advocate  
**Natural Resources Defense Council**

Maureen Drouin  
Executive Director  
**Maine Conservation Voters**

State Representative David Michel  
**Connecticut State Legislature**

Eliza Townsend  
Maine Conservation Policy Director  
**Appalachian Mountain Club**

[Josh Caldwell](#)  
Climate and Clean Energy Outreach  
Coordinator  
**Natural Resources Council of Maine**

Katara Burrola  
Environmental Justice Organizer  
**Mi Familia Vota**

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<sup>3</sup> U.S. Environmental Protection Agency, U.S. Greenhouse Gas Emissions and Sinks 1990-2019 (Apr. 2021), <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019>

[Brian Urbaszewski](#)

Director, Environmental Health Problems  
**Respiratory Health Association Chicago**

Jacob Belgrad  
Environmental Justice Organizer  
**Mi Familia Vota**

Katherine Garcia  
Clean Transportation for All Director  
**Sierra Club**

Hank Webster  
Senior Advocate and Rhode Island Program  
Director  
**Acadia Center**

Andrew N. Kambour  
Senior Policy Advisor, Energy  
**The Nature Conservancy**

Johanna Miller,  
Energy & Climate Program Director,  
**Vermont Natural Resources Council**

Lauren Hierl  
Executive Director  
**Vermont Conservation Voters**

Alok Disa  
Senior Research and Policy Analyst  
**Earthjustice**

Dulce Garduño  
**Mi Villita Neighbors**

Aziz Dehkan  
Executive Director  
**Connecticut roundtable on Climate and  
Jobs**

Lonette Sims  
PRN Chair  
**Peoples Response Network**

Leah Missik  
WA Transportation Policy Manager  
**Climate Solutions**

Victoria Paykar  
OR Transportation Policy Manager  
**Climate Solutions**

Susan Mudd  
Senior Policy Advocate  
**Environmental Law and Policy Center**

Conor Bambrick  
Director of Climate Policy  
**Environmental Advocates NY**

Jana Gastellum  
Executive Director  
**Oregon Environmental Council**

Monique Fitzgerald  
Climate Justice Organizer  
**Long Island Progressive Coalition**

Jonathan Lewis  
Senior Counsel and Director of  
Transportation Decarbonization  
**Clean Air Task Force**

Pete Nichols  
Executive Director  
**Midcoast Conservancy**

Cole Cochrane  
Co-Founder  
**Maine Youth Action**

Tim Miller  
Director  
**Oregon Business for Climate**

Ivy L. Frignoca  
Casco Baykeeper  
**Friends of Casco Bay**

Melissa Iachetta  
Program Manager  
**New Yorkers for Clean Power**

Charles J. Rothenberger  
Climate and Clean Energy Attorney  
**Save the Sound**

Jay Stange  
Transport Hartford Academy Coordinator  
**Center for Latino Progress**