



SUBMITTED VIA ELECTRONIC FILING

December 6, 2024

Dr. Steve Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Second 15-Day Notice of Proposed Modifications to the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure – Released November 21, 2024

Dear Dr. Cliff,

The California Renewable Transportation Alliance (CRTA) appreciates this opportunity to provide additional comments on the second round of Proposed Modifications to the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure, identified in the Second 15-Day Notice released on November 21, 2024 (herein referred to as the “Second 15-Day Changes”).

CRTA is a diverse coalition of renewable fuel producers, fleet operators, engine manufacturers, consumers, and utilities who, in long partnership with California, have invested millions of dollars in providing cost-effective, low-carbon fuel options to decarbonized California’s transportation sector and we remain committed to helping California meet its ambitious climate goals.

The Advanced Clean Trucks (ACT) regulation aims to achieve two main objectives: 1) reduce criteria pollutants to improve local air quality and public health – especially in overburdened communities – and 2) reduce greenhouse gas (GHG) emissions to combat climate change.

It is because we support ambitious goals to decarbonize California’s transportation sector that we believe it is essential to immediately deploy the cleanest commercially-available and viable vehicle technologies suited to specific duty cycles. It is also for this reason that we **support the changes proposed in Section 1963.1(a)(1)** to allow vehicles equipped with engines that meet the Low NOx Omnibus standard to temporarily be exempt from generating ACT deficits. However, we believe it should be implemented sooner.

In our comment letter on the “Proposed 15-Day Modifications to Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure” dated October 7, 2024, we proposed a similar concept to this proposal that urged the CARB Board to “implement a two-year suspension of the deficit generation under ACT for combustion trucks with engines that meet the 50mg Omnibus NOx standard, without the use of credits.” An immediate two-year suspension of the ACT deficit generator could provide significant benefits, including greater near-term emission reductions, compared to a deferred one-year suspension, and swift relief from the current truck market's vehicle shortages.

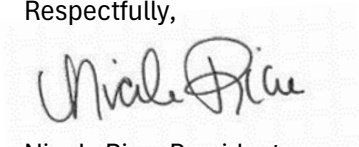
While we appreciate staff's willingness to support the one-year suspension, we urge you to act sooner and **expand this proposal to both new 2025 and 2026 model year engines certified to the 50 mg Low NOx standard, as specified.** Additionally, we urge you to **provide ACF fleets flexibility to preferentially operate vehicles with those cleanest engines within their California fleets.** This will drive additional reductions from in-state and out-of-state fleets operating in the state.

As you know, fleets currently unable to purchase combustion trucks are either continuing to operate older diesel trucks or purchasing higher-polluting diesel trucks from the secondary market. Neither of these options improves near-term air quality for disadvantaged communities. Extending the proposal to 2025 will encourage fleets to adopt cleaner combustion technologies now, when zero-emission alternatives are unavailable, leading to measurable air quality improvements. Failing to do otherwise could simply prompt fleets to delay purchasing decisions until 2026, which would lead to the continued use of older diesel trucks for another year.

It is essential to implement strategies that deliver immediate improvements and ensure cleaner air for those most impacted. Expanding the proposed flexibility to 2025 under ACT and ACF ensures that emission reductions are achieved without compromising economic stability or market functionality. It also acknowledges the current market realities and balances them with the challenges of rapidly scaling up ZEV deployment and the need to provide fleets with flexibility absent noticeable emission increases.

We look forward to your response and are available to discuss our comments in more detail. Feel free to contact me at nicolerice@ca-rta.org to schedule a time.

Respectfully,

A handwritten signature in dark ink, appearing to read "Nicole Rice", is placed over a light gray rectangular background.

Nicole Rice, President
California Renewable Transportation Alliance

cc: CARB Chair and Board Members
Hazel Miranda, Chief of Staff and Policy Advisor to Chair Randolph, CARB
Lauren Sanchez, Senior Advisor for Climate, Office of the Governor
Jamie Callahan, Deputy Chief of Staff and Senior Counselor on Infrastructure, Office of the Governor
Grant Mack, Deputy Legislative Secretary, Office of the Governor