

May 26, 2020

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

Re: Proposed Amendments to the Proposed Advanced Clean Trucks Regulation

Dear Chair Nichols and Honorable Board Members:

The Northeast States for Coordinated Air Use Management (NESCAUM) write to express our strong support for the updates to the proposed Advanced Clean Trucks (ACT) regulation and to urge the California Air Resources Board (CARB) to adopt the ACT regulation.

NESCAUM is the nonprofit association of state air quality agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. As part of a coordinated effort to reduce air pollution in the Northeast, seven of our eight member states have adopted California's Advanced Clean Car standards in lieu of the federal emission standards. Thus, it should come as no surprise that our states are following the ACT rulemaking with great interest.

Our states have expanded their focus on transportation electrification to encompass medium- and heavy-duty vehicles. In the Northeast, on-road diesel vehicles are the largest source of emissions of oxides of nitrogen and the fastest growing source of greenhouse gas emissions within the transportation sector. Building off the success of the 2013 multi-state zero emission vehicle (ZEV) memorandum of understanding (MOU)¹ for light-duty vehicles, NESCAUM is now working with states to accelerate the deployment of electric trucks and buses through the development of a new multi-state MOU. The ACT regulation provides an important regulatory tool to advance electrification of this sector that our states and others will carefully evaluate and consider adopting.

By requiring medium- and heavy-duty truck manufacturers to sell an increasing number of electric trucks in California, the ACT rule will provide much needed environmental, public health, and economic benefits. In our previous comments on the proposed ACT rule, NESCAUM encouraged CARB to consider increasing the proposed 15 percent ZEV sales requirement for Class 2b-3 vehicles and Class 7-8 tractors in 2030. Thus, we are pleased that the updated proposal increases the 2030 requirements for these vehicle groups to 30

¹ State Zero-Emission Vehicles Program Memorandum of Understanding, available at <https://www.nescaum.org/documents/zev-mou-10-governors-signed-20191120.pdf/>.

percent and also strengthens the ZEV sales requirements across all vehicle groups from 2024 to 2029.

These changes, as well as the inclusion of pickups in the Class 2b-3 vehicle group starting in 2024, are supported by the current pace of product development, market readiness, and cost parity projections. There are numerous models already commercially available across the vehicle classes, and manufacturers have announced plans to introduce many new models. Moreover, even without taking into account available incentives in California, total cost of ownership parity is projected for commonly used applications in every vehicle class by 2030, and in many cases before 2025, with steadily declining ZEV costs through 2030. This is important because the cost/benefit calculation is a primary factor that commercial fleet managers consider when making decisions about adoption of new technologies.

Another positive change in the updates to the proposed ACT regulation is adding sales requirements that increase in stringency from 2031 through 2035, rather than remaining constant after 2030. This sends a stronger market signal to manufacturers, supply chains, fleets, and utilities by providing longer-term regulatory certainty to support industry investment in zero emission technologies and infrastructure.

Overall, the changes to the proposed sales requirements will accelerate the market for zero emission trucks and reduce harmful emissions of oxides of nitrogen, fine particulate matter, toxic air contaminants, and greenhouse gases from medium- and heavy-duty vehicles. As a result, the updates to the proposed ACT regulation will provide improved health benefits, especially to communities located near freight corridors, ports, and distribution centers that are disproportionately impacted by diesel emissions.

Although the backdrop for considering the ACT regulation has changed dramatically due to the COVID-19 pandemic, the case for adopting the ACT rule is even stronger. While we have known for some time now that air pollution causes and exacerbates respiratory and pulmonary illnesses,² researchers are now finding that long-term exposure to poor air quality leads to increased risk of death from COVID-19.³ Thus, the ACT rule can provide additional important public health benefits in the future. Moreover, the ACT regulation will help to support the nation's economic recovery from the pandemic by fostering a self-sustaining zero-emission truck market that creates new clean energy sector jobs, increases labor income, and boosts industrial activity.

² CARB Staff Report: Initial Statement of Reasons for Advanced Clean Trucks Rulemaking (Oct. 22, 2019), available at <https://ww3.arb.ca.gov/regact/2019/act2019/isor.pdf>.

³ Wu, X., Nethery, R., Sabath, M., Braun, D., & Dominici F. (2020), *Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study*, available at https://projects.iq.harvard.edu/files/covid-pm/files/pm_and_covid_mortality_med.pdf.

Thank you for the opportunity to comment on the revisions to the proposed ACT regulation. We appreciate California's ongoing leadership in protecting the environment and public health from motor vehicle pollution. Our states look forward to continued collaboration in our joint effort to electrify the transportation sector.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul J. Miller". The signature is written in a cursive style with a large initial "P" and "M".

Paul J. Miller
Executive Director

Cc: NESCAUM Air Directors