

November 22, 2019

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: California Air Resources Board Advanced Clean Trucks Proposed Regulation and Initial Statement of Reasons

To Whom it May Concern,

The Northeast States for Coordinated Air Use Management (NESCAUM) are writing to express our strong support for California's proposed Advanced Clean Trucks regulation. NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

Medium- and heavy-duty vehicles are a major source of greenhouse gas emissions and contribute significantly to unhealthy levels of ground-level ozone and fine particulate matter in our region. Thus, reducing medium- and heavy-duty vehicle-related greenhouse gases and criteria pollution is a high priority for our states.

Our states are undertaking significant efforts to introduce zero emitting medium-duty and heavy-duty trucks by: providing incentives for zero emitting freight trucks, urban buses, and school buses; introducing electric shuttle and urban buses into transit fleets; demonstrating new applications such as electric refuse trucks; allocating Volkswagen settlement funds toward medium- and heavy-duty vehicle electrification; and piloting innovative approaches such as vehicle-to-grid (V2G) electric school buses.

CARB's rulemaking will accelerate zero emission truck deployments and foster a self-sustaining zero-emission truck market. We believe our states will benefit significantly from California's efforts. A strong mandate in California will help introduce more zero-emission technologies in the U.S. market, provide certainty for vehicle manufacturers and fleet operators, reduce greenhouse gases, protect public health, and allow our states to continue moving towards our climate and clean air goals.

In developing the Advanced Clean Trucks Rule, we encourage California to finalize the following items discussed in the Initial Statement of Reasons (ISOR), including:

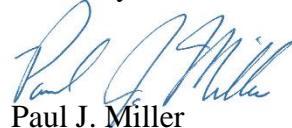
- Establishing a chassis/vehicle sales requirement for 2024-2030;
- Establishing a zero emission sales requirement for Class 2b-3; Class 4-8 vocational; and Class 7-8 tractors beginning in 2024;

- Establishing a zero-emission powertrain certification requirement beginning in 2024;
- Creating a credit and deficit system that encourages early action and flexibility;
- Identifying a long-term ZEV goal for medium- and heavy-duty vehicles that is consistent with state goals to substantially reduce GHG emissions by 2050;
- Maintaining the proposed one credit for each zero-emission vehicle to avoid multipliers for longer range vehicles; and
- Identifying approaches to prioritize communities disproportionately impacted by transportation emissions.

Given the current pace of medium- and heavy-duty zero emission vehicle product development and fleet adoption, NESCAUM encourages CARB to consider increasing the currently proposed 15 percent 2030 sales requirement for combination tractors and class 2b-3 vehicles. Adoption of a strong rule will send a clear market signal to industry and help to accelerate the transition to zero emission medium- and heavy-duty vehicles.

Our states, and the entire nation, have benefitted from California's exceptional leadership in putting us on the path to a zero-emission transportation sector. We look forward to working closely with California, industry, and other key partners to build a robust market for electric buses, trucks and vans in our states and across the nation.

Sincerely,



Paul J. Miller
Executive Director

cc: NESCAUM Directors