



September 30, 2021

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

Subject: Mobile Source Strategy and Truck Retirement

Dear Chair Randolph and members of the Board:

As members of California's health community, we write to call on the California Air Resources Board (CARB) to include a truck retirement strategy within the Mobile Source Strategy (MSS) scheduled to be discussed at CARB's October hearing. We believe CARB has an important opportunity to accelerate reductions in pollution that threaten public health, especially in California's most vulnerable and pollution-impacted communities. By adding truck retirement as a strategy for the MSS and the 2022 State Implementation Plan that follows, CARB can deliver near-term emission reductions and reduce health disparities.

California is home to the most difficult air pollution challenges in the United States, and heavy-duty trucks contribute significantly to public health burdens in communities across the state. The trucking sector is a dominant source of harmful pollution in California, generating approximately one-third of the state's smog- and particle-forming NOx emissions, and approximately one-quarter of all carcinogenic diesel particle pollution. These emissions translate into real-world health emergencies and health disparities that would be significantly reduced by expanding truck retirement proposals that transition older vehicles out just as CARB regulations are moving cleaner and zero-emission trucks into the fleet.

We appreciate CARB staff improving the MSS document over the course of its development, but believe that the addition of a truck retirement strategy will strengthen the roadmap to a more livable, breathable future. Health organizations have [previously voiced our support](#) for the MSS being designed to accelerate the transition to zero-emission technologies; clean up combustion vehicles; and reduce vehicle miles traveled in support of healthier communities. We urge you to maintain that focus, but we now restate our support for the inclusion of truck retirement, and call

on CARB to expand the scope of the port truck retirement proposals under consideration within the Advanced Clean Fleet (ACF) regulation to accomplish this goal.

CARB's ACF proposal offers a significant opportunity to accelerate the turnover of California's oldest, highest-polluting trucks. The proposed regulation would phase out port drayage trucks older than 13 model years of age that reach either 800,000 miles or 18 years from certification. This provision is critical to removing high-polluting vehicles from the drayage port truck fleet, but should be expanded to ensure that all trucks in California meeting these thresholds (defined by state law) are retired to protect public health.

We urge the Board to direct staff to expand the ACF truck retirement provision to all trucks, and to set the broader truck retirement requirement as a priority strategy within the Mobile Source Strategy and the 2022 State Implementation Plan. Please contact Will Barrett at william.barrett@lung.org for any additional information.

Sincerely,

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