Bill Magavern
Item# 26-5-2

Coalition for Clean Air
Environment California
Natural Resources Defense Council
The Greenlining Institute

July 23, 2026

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: 2026 SIP Revisions for the California Extreme Ozone Nonattainment Areas – Retire Old Diesel Trucks

Members of the California Air Resources Board,

As leaders of the Charge Ahead California campaign, we submit these comments regarding the California Air Resources Board's (CARB) 2026 State Implementation Plan (SIP) Revisions for the California Extreme Ozone Nonattainment Areas proposed by CARB staff.

California is home to the most polluted air in the United States, according to the American Lung Association's annual State of the Air 2026 report. Seven of the ten smoggiest cities in America are in California, as are seven of the most particle-polluted. Air pollution causes a wide range of health impacts, including asthma attacks, heart attacks, strokes, lung cancer and thousands of premature deaths annually in California. Pollution threatens the health of all Californians, but especially those in our most disadvantaged communities and communities near ports, railyards, warehouses and other major trucking routes. The task of cleaning up pollution from the movement of goods has been made even more difficult by the federal government's illegal rescissions and rollbacks of vital California safeguards.

Heavy-duty trucks are responsible for over half of smog- and particle forming emissions despite representing only three percent of the vehicles on California roads. Diesel exhaust

is a toxic air contaminant containing dozens of carcinogens and is often concentrated in low-income communities and communities of color. Many thousands of trucks become gross polluters as they age and emission controls deteriorate over time. The required retirement and replacement of these old dirty diesel trucks once they reach their full useful life, within the parameters of state law (Senate Bill 1, 2017, Beall), would immediately reduce harmful air pollution, health effects, and pollution-related disparities in environmental justice areas.

Requiring the retirement of old heavy-duty diesel trucks is probably the single biggest step that CARB could take to reduce air pollution in California. Adopting such a measure would require no additional statutory authority or federal approval; it would only take a willingness by the Board to take this life-saving step. CARB made a commitment in the 2022 SIP to truck retirement through a "Zero Emission Trucks" measure, but has made no discernible progress on it. The April 2026 proposal does include "Accelerated turnover of in-use vehicles to cleaner technologies at the end of their useful life" as a possible strategy; that option should be firmed up into a SIP commitment (along with many other measures that we support but are not addressing in this letter).

How Does State Law Define "Useful Life?"

Section 43021 of the Health and Safety Code, enacted by SB 1 in 2017, intends to provide "certainty about the useful life of engines." The provision prohibits CARB from requiring the retirement, replacement, retrofit, or repower of heavy-duty trucks until they have reached at least 13 years of age and then reach either 800,000 miles or 18 years, whichever comes first. This definition of useful life was *de facto* sponsored by the CA Trucking Assn. While this provision essentially invited CARB to require retirement at the end of useful life, no action has been taken to make sure the oldest trucks are in fact phased out, other than in the drayage portion of Advanced Clean Fleets.

What Are the Benefits of Retiring Old Trucks?

1. Diesel engines and emission controls degrade with age, so older trucks almost always emit more pollution than younger ones;
2. Before 2013, heavy duty trucks did not have on-board diagnostics (OBD), which means their emission controls are not as robust and the trucks will not be captured as well by CARB's Clean Truck Check program, which relies heavily on OBD;
3. Mandating turnover will provide more opportunities for the deployment of zero emission vehicles.

What NOx Reductions Could Be Realized?

CARB staff ran a scenario in 2020 where California trucks at the end of their useful life were replaced with ZE trucks. NOx emissions reductions from this fleet turnover scenario were 33 tons per day in 2031 for 139,000 vehicles and 31 tpd in 2037 for 197,000 vehicles. While not all trucks would be replaced by zero emission engines, this scenario illustrates the magnitude of reductions that are possible. We urge CARB to update this projection as soon as possible.

We look forward to working with CARB on this important measure to protect Californians from toxic diesel exhaust.

Respectfully Submitted,

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