

**Comment 1 for Open Comment for the October 27, 2022 Board Meeting  
(oct2022opencomm) - Non-Reg.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 2 for Open Comment for the October 27, 2022 Board Meeting  
(oct2022opencomm) - Non-Reg.**

First Name: Muriel

Last Name: Strand

Email Address: ecoengr@comcast.net

Affiliation:

Subject: Environmental Justice in the Long-Haul Trucking Industry

Comment:

According to Prof. Steve Viscelli, many truckers, particularly contractors, are being seriously exploited by freight companies.

He describes the situation in detail in his recent book, "The Big Rig: Trucking and the Decline of the American Dream."

<https://www.ucpress.edu/book/9780520278127/the-big-rig>

Please keep this in mind as you consider and likely approve today's regulation of the long-distance trucking sector, and also as implementation proceeds.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 07:43:37

No Duplicates.

**Comment 1 for Open Comment for the October 27, 2022 Board Meeting  
(oct2022opencomm). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## Comment 2 for Open Comment for the October 27, 2022 Board Meeting (oct2022opencomm). (At Hearing)

First Name: Nahndi

Last Name: Chiumya

Email Address: yanteagnes@gmail.com

Affiliation: United States Catholic Bishops (USCCB)

Subject: Technological Production, Human Health: National Religious Partnership for the Environment

Comment:

<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">On Behalf of National Religious Partnership for the Environment --- Nahndi Chiumya, Cultural Environmentalist</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">It is broadly known that President Biden favors U.S production for the supply of electric motor battery, although this product (longer lasting battery is produced in 3 nations worldwide- - Austrailia, Chile and, China, this would mean a strategic mapping of nickel drilling sites if production were to take place in the Unites States.</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&ldquo;Please protect U.S state grasslands; including <a style="color: #0563c1;" href="https://www.wtoc.com/2022/10/26/smaller-companies-will-help-supply-new-hyundai-plant/">Georgia</a>. While land is for production, it is also a refuge and the blueprint since before our time was for that land to be cultivated, predictions for United States farming should be at the front of the clean air conversation.&rdquo;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&ldquo;Lastly, U.S exports may be slow; I believe it is &nbsp;<best to be realistic about the limitations of technological production and its drawbacks in the everyday, like less- selection in the U.S food market and high gas prices being a regular occurrence, especially in the great return to the earth and fight for environmental protections.&rdquo;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;"><a style="color: #0563c1;" href="https://www.wtoc.com/2020/10/23/rule-change-could-allow-mining-near-okefenokee-swamp/">WTOC 2022</a>- 2020 &ldquo;environmental protections are still under inspection&rdquo;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>

<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">If the board is willing to please consider the following statement;&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: Calibri, sans-serif;">&nbsp;</p>  
<p class="MsoListParagraph" style="margin: 0in 0in 0in 0.5in; font-size: 12pt; font-family: Calibri, sans-serif; text-indent: -0.25in;">-<span style="font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 7pt; line-height: normal; font-family: 'Times New Roman';">&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</span>What are the environmental drawbacks for long lasting impact for a clean earth, what are the necessary risks--- what is California&rsquo;s (State-Plan) plan on limitations for drilling?</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 08:07:55

No Duplicates.

**Comment 3 for Open Comment for the October 27, 2022 Board Meeting (oct2022opencomm). (At Hearing)**

First Name: Richard J

Last Name: Jackson

Email Address: dickjackson@ucla.edu

Affiliation: UCLA

Subject: Advanced Clean Fleets and children's health

Comment:

<p class="MsoNormal" style="text-align: center;" align="center"><span style="mso-bidi-font-size: 14.0pt; line-height: 107%;">Advanced Clean Fleets (ACF) Rule </span>October 27, 2022 Testimony Before the California Air Resources Board</p>

<p class="MsoNormal" style="text-align: center;" align="center"><span style="mso-bidi-font-size: 14.0pt; line-height: 107%;">Richard J Jackson MD MPH</span>&nbsp;</p>

<p class="MsoNormal"><span style="mso-bidi-font-size: 14.0pt; line-height: 107%;">I am Dr Richard Jackson, a Pediatrician and Professor emeritus at the UCLA Fielding School of Public Health.<span style="mso-spacerun: yes;">&nbsp;</span>I have interacted with CARB many times and I thank the Board for its leadership over the years.<span style="mso-spacerun: yes;">&nbsp;</span>My past service includes as the California State Public Health Officer, and my federal service includes nine years as Director of the Centers for Disease Control&rsquo;s National Center for Environmental Health. I join you today to urge the Board to adopt the strongest possible Advanced Clean Fleets (ACF) rule.<span style="mso-spacerun: yes;">&nbsp;</span></span></p>

<p class="MsoNormal"><span style="mso-bidi-font-size: 14.0pt; line-height: 107%;">You may have heard about something that many young families in America are now confronting: we are in the midst of a large RSV, Respiratory Syncytial Virus, outbreak.<span style="mso-spacerun: yes;">&nbsp;</span>This infection, which is a nuisance for healthy adults, can make very young children deathly ill.<span style="mso-spacerun: yes;">&nbsp;</span>Latest CDC data indicates that 58,000 children have been hospitalized with it, and with over 200 deaths of children under age 5.<a style="mso-endnote-id: edn1;" title="" href="file:///C:/Users/dickjackson/Dropbox/PC/Documents/Advanced%20Clean%20Fleets%20ARB%20Hearing%20Oct%2027%202022%20RJJackson%20final.docx#\_edn1" name="\_ednrefl"><span class="MsoEndnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoEndnoteReference"><span style="font-size: 14.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-bidi-font-family: 'Times New Roman'; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[i]</span></span><!--[endif]--></span></span></a><span style="mso-spacerun: yes;">&nbsp;</span>Why do children suffer so much more?<span style="mso-spacerun: yes;">&nbsp;</span>It goes back to what we learned in middle school, when you decrease he radius of a circle, you decrease its area as a square function: that is, if the radius declines from 3 to 1, you decrease the area

by nine times.  These numbers are fundamental to a child's breathing.  The cross-sectional area of a pipe, including the pipes in our lungs (the bronchi and bronchioles), determines air flow.  Small constrictions of children's already narrow pipes cause large decreases in air flow. One effect we see is "air hunger" --terrifying for the child and her parents.  

But not just viruses slow air flow, so do irritants like nitrogen oxides and particles.  Relative to their body weight children move 2-3 times more air than do adults, and children need to play and exercise outside--then they move ten times or more air.  Up until about age six, the young child's lungs are growing their lifetime supply of new alveoli, the little air sacs essential to gas-exchange. These early years of life are critical for lung growth, and remain important when older.  Early life lung damage reduces lifelong ability to cope with intensive exercise or respiratory infections.  

my PBS television series, I interviewed families and children near the ports of Oakland and Long Beach, and in Boyle Heights near the Freeway tangle in LA.  The Board members know better than anyone that some of California's worst air quality is in areas with large numbers of heavy-duty vehicles including Class 8 diesel tractor trucks which emit 62 percent of nitrogen oxides and 57 percent of fine particulates.  Children need the Board to move the Advanced Clean Fleets (ACF) rule four years earlier: four years is a preschooler's lifetime.  Delaying means cheating children of the lung function they need now, and for the rest of their lives.

Richard J Jackson MD MPH

2617 Le Conte Ave, Berkeley, CA 94709 [Dickjackson@ucla.edu](mailto:Dickjackson@ucla.edu)       510 295 5674

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<a style="mso-endnote-id: edn1;" title="" href="file:///C:/Users/dickjackson/Dropbox/PC/Documents/Advanced%20Clean%20Fleets%20ARB%20Hearing%20Oct%2027%202022%20RJJackson%20final.docx#\_ednref1" name="\_edn1"></a>

Attachment: [www.arb.ca.gov/lists/com-attach/5-oct2022opencomm-AWBcPgF2UGIBaQFi.docx](http://www.arb.ca.gov/lists/com-attach/5-oct2022opencomm-AWBcPgF2UGIBaQFi.docx)

Original File Name: Advanced Clean Fleets ARB Hearing Oct 27 2022 RJJackson final.docx

Date and Time Comment Was Submitted: 2022-10-27 10:46:05

No Duplicates.





## **Comment 4 for Open Comment for the October 27, 2022 Board Meeting (oct2022opencomm). (At Hearing)**

First Name: Judith

Last Name: Borcz

Email Address: judy@norquay.com

Affiliation: N/A

Subject: Strengthen Truck Rules

Comment:

<p>My name is Judith Borcz.&nbsp; I represent the volunteer organization, Climate Action CA in the Bay Area, and lead the transportation sub-committee.&nbsp; I want to advocate strongly for the <strong>alternative</strong> plan to bring more electric trucks to the road faster, and strengthen it to better address the largest polluting trucks, big rigs/drayage. Specifically, I ask that the rule require <strong>100% zero-emission vehicle sales by 2036 rather than 2040</strong>.&nbsp; The technology is there to achieve this goal, and our very poor air quality and climate change impacts are already severe. Drought and increased wildfires in the state are causing huge costs to us all, and the health impacts of air quality are prevalent.&nbsp;</p>

<p>Our group asks that <strong>class 7 and 8 truck regulations should cover fleet sizes of 10 or greater, rather than 50, and as Senator Durazo stated, the regulations should fall to the large corporations that operate the trucks rather than burdening mis-classified "independent" truckers</strong>.&nbsp; We advocate that class 8 sleeper cabs be moved from group 3 to group 2 vehicles in the high priority fleet rule so that all class 7 and 8 tractors are subject to the same transition schedule beginning 2027 rather than 2030.</p>

<p>CA has some of the most polluted air in the country as you have shown in your presentation today.&nbsp; Port and Central Valley warehouse communities are severely impacted. We must do more to get rid of diesel exhaust pollution.&nbsp; And we must do so much quicker than the current rule proposes.&nbsp;</p>

<p>Thank you,</p>

<p>&nbsp;</p>

<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 10:37:19

No Duplicates.

## **Comment 5 for Open Comment for the October 27, 2022 Board Meeting (oct2022opencomm). (At Hearing)**

First Name: Tom

Last Name: Greene

Email Address: greenet@ranchowater.com

Affiliation: Rancho California Water District

Subject: We support ACWA and CMUA Comments on Commercial Availability  
Comment:

Hello.   
I am Tom Greene from Rancho California Water District.   
We serve over 150,000 people in Southwest Riverside County.   
We have over 1,000 miles of pipes, 100 wells and pump stations and one hundred trucks.   
We currently have 7 and a half Megawatts of solar power, and are working on another 5 Megawatts of hydro-electric and battery storage projects.   
We have 6 vehicle charge points installed so far and many of our employees are early adopters with good results. 

Because of those good results, We have been looking to purchase heavy duty electric trucks and we are working on a vehicle electrification master plan.   
We've checked the specifications from over 30 manufacturers, on over 50 trucks, many of which don't even have a prototype yet. But we yet haven't yet found any chassis cabs or even heavy-duty pickups that can meet the gross vehicle weight ratings and trailer towing ratings, along with the distances needed to replace our trucks. Some bus chassis looked promising, but a few manufacturers have told us that the drive-trains are not rated for towing. Thus, we are settling on purchasing some all-electric half-ton pickups for inspectors in the short term.   
Specifications show that these trucks can tow heavy loads, but testing has shown that they lose range by up to two thirds when towing.   
Thus, we are expecting that those trucks won't be able to carry the loads needed to do the work we need done every day.   
We need to fix pipes in the roads, this is work we do every day.   
Our work is often performed in the streets, where the vehicles also use power take off equipment and where there aren't any charge points. 

   
We expect that the vehicle manufacturers will eventually engineer the trucks needed to perform our work in the future.   
But to have every single public agency, searching every single vehicle manufacturer to find specifications of all the vehicles, every single budgeting time of the fiscal year is wasteful and detrimental to getting the vehicles purchased.   
Thus, we join with the Association of California Water Agencies and the California Municipal Utilities Association in calling for CARB

to keep an ongoing Commercial Availability list, showing all of the specifications of vehicles, instead of a vehicle unavailability list.&nbsp; This includes the range results when fully loaded and the pricing.&nbsp; We need to know about trucks that are actually being built on assembly lines instead of just on the drawing boards. &nbsp;

&nbsp;

We also join the Metropolitan Water District in requesting that the rule have some flexibility to extend the 50% buying limits till the year 2030 for those classes of vehicles that are not commercially available. Thank you.

&nbsp;

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 15:13:34

No Duplicates.

**Comment 6 for Open Comment for the October 27, 2022 Board Meeting  
(oct2022opencomm). (At Hearing)**

First Name: Patricio

Last Name: Portillo

Email Address: pportillo@nrdc.org

Affiliation:

Subject: Out of State Support for ACF

Comment:

<p>Please find attached a support letter from stakeholders outside of California in strong support for adopting a strengthened ACF rule.</p>

Attachment: [www.arb.ca.gov/lists/com-attach/8-oct2022opencomm-AmMBZFUyAw9VIAB1.pdf](http://www.arb.ca.gov/lists/com-attach/8-oct2022opencomm-AmMBZFUyAw9VIAB1.pdf)

Original File Name: ACF Support Letter\_Out of State Stakeholders.pdf

Date and Time Comment Was Submitted: 2022-10-27 16:36:02

No Duplicates.

**Comment 7 for Open Comment for the October 27, 2022 Board Meeting  
(oct2022opencomm). (At Hearing)**

First Name: Rogelio  
Last Name: Fernandez  
Email Address: Ferdelroge@gmail.com  
Affiliation:

Subject: Air resource  
Comment:

<p>The border Otay mesa we make More 8 hours&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 16:57:23

No Duplicates.

## Comment 8 for Open Comment for the October 27, 2022 Board Meeting (oct2022opencomm). (At Hearing)

First Name: Megan

Last Name: Whitman

Email Address: mhwhitman@gmail.com

Affiliation: Physicians for Social Responsibility

Subject: Advanced Clean Fleet rule

Comment:

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<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;
margin-bottom: 0pt;"><span style="font-size: 12pt; font-family:
Arial; color: #222222; background-color: #ffffff; font-weight: 400;
font-style: normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">Good morning, My
name is Dr. Meg Whitman and I am a primary care physician
in&nbsp;</span></p>
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;
margin-bottom: 0pt;"><span style="font-size: 12pt; font-family:
Arial; color: #222222; background-color: #ffffff; font-weight: 400;
font-style: normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">Davis, CA, and a
member of Physicians for Social Responsibility.&nbsp;  I am speaking
today in support of the </span><span style="font-size: 12pt;
font-family: Arial; color: #222222; background-color: #ffffff;
font-weight: bold; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;">alternative plan</span><span style="font-size: 12pt;
font-family: Arial; color: #222222; background-color: #ffffff;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;"> to bring electric trucks to the road faster, to more
quickly address the dangerous polluting trucks on our roads.
</span><span style="font-size: 12pt; font-family: Arial; color:
#222222; background-color: #ffffff; font-weight: bold; font-style:
normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">We need 100% EV
truck sales by 2036. and</span><span style="font-size: 12pt;
font-family: Arial; color: #000000; background-color: transparent;
font-weight: bold; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;"> to reduce the priority fleets from 50 to 10 trucks for
Class 7 & 8 tractor trailers</span><span style="font-size:
12pt; font-family: Arial; color: #000000; background-color:
transparent; font-weight: 400; font-style: normal; font-variant:
normal; text-decoration: none; vertical-align: baseline;
white-space: pre-wrap;">.&nbsp;</span></p>
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff;
margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff;
margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt;
font-family: Arial; color: #222222; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;">Californians are breathing the most polluted air in the
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country. Neighborhoods near warehouses and families living next to highways get the worst of it. The unfair exposure of these mostly BIPOC communities to toxic diesel exhaust pollution is a shockingly clear example of present day environmental racism.

**id="docs-internal-guid-e41a83dc-7fff-0a98-63d7-8c6819d400e4" style="font-weight: normal;">**

This board can swiftly bring polluting trucks into the future and achieve environmental justice by adopting the ACF Accelerated ZEV Transition Alternative that requires 100% electric truck sales by 2036.

Why does air pollution matter to me, a mother and a primary care physician?

In Nov 2018, I was 7 months pregnant and practicing primary care in DT sacramento. One day, the sun never rose and the sky remained dark; it was full of the thick black toxic smoke from the CAMP Fire. Maybe you remember where you were that day?

Within a few hours, patients started to pour into the clinic, coughing and wheezing, desperate for oxygen. Nurses triaged patients in the hallways and I moved as fast as my heavily pregnant body allowed; administering nebulizer after nebulizer treatment, anxiously listening to the lungs of my struggling patients. And every breath I took, I knew, was being directly transmitted to my unborn son. Eventually, the smoke overwhelmed our air filtration system, and it became too dangerous to breathe so we evacuated the clinic.

Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">&nbsp;A few weeks later, I was awakened by the first sharp, terrifying contractions of preterm labor.&nbsp;&nbsp;&nbsp;</span></p>  
<p><strong style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">That event showed me that doctors are, to be honest, a bit helpless when it comes to the severe health harms of air pollution.&nbsp; &nbsp; We have some tools in our pockets - medications, nebulizers, masks - but the REAL POWER in protecting patients, by eliminating air pollution,&nbsp; lies in YOUR hands.&nbsp; </span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: bold; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Please, protect my patients, my children, and you and your children by accelerating the ACF ZEV rule to 100% by 2036.&nbsp; and</span><span style="font-size: 12pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: bold; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">&nbsp; reducing the priority fleets from 50 to 10 trucks for Class 7 & 8 tractor trailers. </span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Thank you, </span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Dr. Meg Whitman</span></p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 17:09:40

No Duplicates.