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Why CARB Should Expand the NZEV Definition to Include Low NOx Trucks Certified at 50 mg or Lower NOx Emissions

- **Need to improve** the market's ability to purchase a clean truck and allow regional districts to encourage these purchases in their ISRs.
- **PROBLEM:** fleets are purchasing used diesels for compliance v. new trucks.
- **Amendment below:** needed to improve ACT's flexibility while delivering Near Zero emissions levels.

- **Truck Sales are Significantly Down:**

- CA truck sales are down 60-80%, especially in the heavier classes (4-8 and 7-8 tractor groups).
- More than 90% of all ZEV deliveries in MY 2023 were Class 2b-3 vehicles from three manufacturers.

- **HD Omnibus-compliant Engines are Ultra Clean:**

- A recent UC Riverside scientific study also found that, "natural gas engines certified to 0.02 g/bhp-h NOx comfortably meet the 2027 and 2035 NOx standards."
- RNG trucks deliver 88% of the benefits of electric vehicles according to Energy Vision study.¹
- UC Riverside's Center for Environmental Research and Technology found that a complete transition to zero emissions after 2027 would only provide an additional 5.1% emissions reduction v. Omnibus compliant low NOx trucks.

- **Classes 7-8 Hybrid Manufacturers May Want More Flexibility:**

- PACCAR's comment that the All-Electric Range should be less stringent than 45 miles may indicate that there may be limited product availability.
- Omnibus compliant product, however, is on the market.

¹ Energy Vision, March 2025, "A Path to a Healthier America: Ditching Older Diesel Trucks"

- **Affordability:**
 - Fleets, especially smaller fleets, are more challenged economically to fully participate in ZEV strategies and clean Omnibus trucks provide an opportunity for more fleets to drive clean trucks.
- **AQMD Indirect Source Rules:**
 - Regional indirect source rules would benefit from a NZEV definition defined at 50mg or lower NOx emissions, rather than remain constrained to the current definition in the California Code of Regulations.
- **Potential Loss of EPA Waivers:**
 - Expanding the NZEV definition sends an important market signal to CA fleets to make the cleanest ICE engine purchase over legacy diesels.

Official Request: Amend definition of “Near-zero emission vehicle”:

- Current Language:

"Near-zero-emission vehicle" or "NZEV" means one of the following:

- (A) An on-road plug-in hybrid electric vehicle which has the same definition as that in 40 CFR section 86.1803-01, amended on July 1, 2011, incorporated by reference herein, that achieves all- electric range as defined in section 1963(c); or
- (B) An on-road hybrid electric vehicle that has the capability to charge the battery from an off-vehicle conductive or inductive electric source and achieves all-electric range as defined in section 1963(c).

Proposed Amendment:

- (C) **An on-road low-NOx medium- or heavy-duty vehicle powered by an engine that is certified to the California Air Resources Board’s Omnibus-compliant standard at or lower than 50mg/bhp-hr.**