

## **Recommendations for proposed amendments to ACT regulation**

Date: June 23, 2025

California Air Resources Board

1001 I Street Sacramento, CA

95814

Re: July 24, 2025 hearing on Advanced Clean Trucks

The need to enhance the ACT regulation to further reduce emissions while decreasing the localized environmental impact and limiting economic challenges to the regulatory bodies that comprise the adoptees of the ACT is crucial for CARB to ensure a continued adoption of the ACT regulation in the near future.

To enhance the equity and effectiveness of the Advanced Clean Trucks (ACT) regulation, CARB should consider incorporating guardrails into the proposed credit pooling provisions to ensure that air quality and public health benefits are distributed equitably across all ACT-adopting regions. Specifically, CARB should require that no less than 50 percent of credits applied toward compliance obligations originate from that same location. This provision would help mitigate the risk of manufacturers over complying in certain jurisdictions while underdelivering ZEV benefits in others, particularly in states with higher pollution burdens or less mature ZEV markets and adoption rates.

In tandem, CARB should establish a Zero-Emission Vehicle (ZEV) Transition Technical Assistance Program to support fleet operators in navigating the operational, financial, and infrastructure challenges associated with transitioning to ZEVs. This program should be designed in partnership with local air districts, utilities, and community-based organizations to ensure culturally competent, localized, and effective tailored support. Technical assistance offerings should include procurement guidance, infrastructure planning resources, offering funding incentives, and regulatory compliance training.

To further encourage in-state ZEV deployment while preserving cross-state compliance flexibility, CARB should implement incentive structures that reward manufacturers for prioritizing ZEV sales in underrepresented markets. This could include assigning enhanced compliance multipliers (1.2x) for ZEVs sold or acquired in regions with lower adoption rates, underserved communities, or designated disadvantaged areas. Such incentives would help drive

more equitable geographic distribution of zero-emission technologies and strengthen market transformation across all ACT states.

Recognizing the critical role that infrastructure plays in enabling successful ZEV adoption, CARB should require that manufacturers utilizing credit pooling demonstrate the presence—or planned deployment—of adequate charging or hydrogen refueling infrastructure in the credit-receiving jurisdiction. In parallel, CARB should encourage proactive coordination between manufacturers, utilities, and public utility commissions to align grid planning, charging rates, and investment strategies with anticipated ZEV market growth, ensuring that infrastructure availability keeps pace with regulatory requirements.

Finally, regarding the proposed reduction in the minimum all-electric range threshold for near-zero-emission vehicles (NZEVs) after model year 2030, CARB should conduct a 2 year comprehensive performance and equity review. This review should evaluate the real-world emissions performance, public health implications, and potential market impacts of increased reliance on NZEVs. While NZEVs may serve as an important transitional solution, the regulation should continue to prioritize the deployment of full ZEVs as a long-term standard. The amended framework should make clear that while NZEVs remain preferable to conventional combustion vehicles, they should not be viewed as an equal substitute for ZEVs.