



September 16, 2026

Dr. Steven Cliff, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on “Draft 2026 Roadmap to Reduce Air Toxics”

Dear Dr. Cliff:

On behalf of Clean Energy, I appreciate the opportunity to comment on *Draft 2026 Roadmap to Reduce Air Toxics* (Roadmap).

Among several of the key priorities for the development of the Roadmap, CARB wants to “develop policies and methods to evaluate and address cumulative risk from ambient exposure.” The Roadmap states, “Although we have been successful, having reduced statewide diesel particulate matter (DPM) emissions by 86% through 2025, in communities where diesel engine use is concentrated, risk is still unacceptably high and efforts to reduce DPM must continue.”

The Roadmap also expresses the goals of reducing and preventing harm to communities, and to “move from today’s fragmented and reactive approach toward one that is strategic, coordinated, efficient, and grounded in shared scientific understanding. Strengthening state and air district capacity will be essential to fulfilling the vision outlined in this Roadmap.”

We strongly support these goals and believe our industry must continue to be a part of the solution. As the Roadmap points out, California has 12 diesel-focused regulations that have been successful in reducing emissions and DPM. Public health has benefited significantly, but the toxic air contaminants from diesel persist and much more needs to be done. Too many diesel trucks remain on California’s roads and federal actions threaten to elongate and compound this outcome.

Federal Repeal of CARB’s Omnibus Rule Makes NZE Mitigation Option Critical to Public Health

With the federal government’s invalidation of California’s Omnibus rule and California’s 2010 model year truck standards, California fleets can legally purchase 200mg NOx trucks and operate them for up to 18 years per the useful life provision in Senate Bill 1 (2017).

Furthermore, the United States Environmental Protection Agency’s (EPA) 2010 heavy-duty truck standard is not only less stringent than California’s 2010 truck standards, U.S. EPA’s version does not

include the 20mg optional low NOx standard. This situation opens up the flood gates for fleets to purchase new diesel trucks that meet a minimal standard that was established 16+ years ago with no policy signal to regional or inter-state fleets to purchase cleaner combustion options that are available on today's market.

This problem is significantly compounded by the U.S. EPA having recently released the draft heavy-duty NOx rule that would allow the future purchases of diesel trucks which meet a 200mg NOx standard in exchange for a \$6,700 "nonconformance penalty."

Heavy-Duty Diesel Truck Pollution Must Be Addressed

As CARB finalizes the Roadmap, we encourage the development of new and amended regulations that take an "and" approach to displacing these diesel trucks: zero and near-zero (NZE) emission trucks which meet a 50mg NOx or lower standard. California has prioritized the adoption of zero-emission heavy-duty trucks, and this is one part of the solution, but there are too many diesel trucks and not enough near-term deployment of zero-emission trucks.

Adding new mitigation measures and incentives that can effectively address the pollution impacts generated by today's regional and interstate heavy-duty diesel trucks in the near- to mid-term is critical. Heavy-duty diesel trucks in the classes 7-8 tractor class are the largest single source of pollution in the transportation sector and remain "hard-to-electrify".

Solution

We strongly recommend that CARB include as part of the Roadmap the use of the "and" strategy: the adoption of zero- and NZE heavy-duty trucks to displace diesel trucks, and this be utilized in relevant new and amended regulations and financial incentives programs.

This could be achieved by setting a NZE emissions target based on an engine's certified Family Emission Limit (FEL). For example, a program could incentivize NZE trucks to operate at indirect sources that meet a FEL set at 50mg or 35mg NOx. Such an action would help reduce the purchases of new 200mg diesel engines and deliver tangible and much-needed protections to our most impacted communities.

We understand the California Code of Regulations could also be an impediment due to existing definitions of NZE. We would like to explore with the relevant willing parties how to remedy these barriers.

Omnibus Compliant Engines are the Equivalent to 20mg Optional Low NOx Engines

Omnibus engines are the same engines that were once certified to the 20mg Optional Low NOx standard several years ago but are put through stricter low-load, real-world emissions testing with extended useful life and warranty periods (up to 800,000 miles). Further, those engines that are certified to lower levels than 50mg NOx are likely to be much cleaner than the engines at 20mg NOx. Hence, incentivizing trucks that meet a stricter FEL standard at Omnibus or lower levels not only mitigates 200mg engine operations, but likely encourages engines that meet stricter standards and possess longer useful life and warranty requirements.

Adopting a NZE Strategy

Adopting a NZE mitigation strategy based on a FEL at or below 50mg NOx not only will help improve overall air quality from trucks operating throughout our state's indirect sources, it also supports those engine manufacturers and fuel providers who made the necessary investments to support the state's clean heavy-duty truck standards. Making the transition to a zero-emission future will take time. California's policies for ZEV light-duty passenger cars started in the early 1990s and, 36 years later, ZEV passenger car sales accounted for a little over 20% of total new car sales. Much like the light-duty sector, California and other regions throughout the country will need clean combustion strategies for the next several decades.

Conclusion

If California is to achieve clean air attainment with the federal Clean Air Act standards, we must strive for a zero emissions future and encourage the cleanest combustion options available to us when electrification cannot meet our regional trucking needs. We therefore strongly urge CARB to embrace a heavy-duty truck mitigation strategy as part of the Roadmap.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Kenny", with a long horizontal flourish extending to the right.

Ryan Kenny
Policy Director – Western U.S.
Clean Energy