

April 4, 2022

Dear Colorado Legislators,

We are writing in opposition to using up to \$15 million of state funding on new diesel trucks, as proposed in Section 3 of Senate Bill 193. We instead support using the funding to decommission old diesel trucks and replace them with all electric, zero-emission trucks. Diesel trucks disproportionately contribute to dangerous air and climate pollution, while electric trucks operate with zero tailpipe emissions, delivering clean air for communities and protecting our climate. If strategically deployed, these new zero-emission trucks could improve air quality in disproportionately impacted communities that bear the brunt of pollution from trucking and the freight industry.

SB 193, as introduced, allocates \$15 million to take some of the oldest diesel trucks off the road, allowing for their replacement with newer diesel or electric trucks. We oppose the use of state funds to purchase new diesel trucks, which will be on the road for decades to come and offer minimal climate, air quality, and economic benefits compared to electric trucks. Limited state funding should only be spent to accelerate Colorado's transition to electric trucks, aligning with other components of the bill that will fund electric school buses and electric bikes.

**An investment in zero-emission electric trucks means an investment in:**

- **Improved air quality:** The Front Range has been in chronic noncompliance of federal air quality standards and the EPA is expected to downgrade the region yet again to severe nonattainment. Zero-emission trucks offer the greatest tailpipe emission reductions for criteria pollutants compared to diesel engines. Moreover, even when factoring in early truck retirement and the higher upfront cost of zero-emission trucks, electric trucks remain the most cost-effective solution to cut tailpipe pollution and improve public health in communities. Toxic local air pollution caused by diesel trucks poses a significant risk to public health and therefore considerable economic costs in the form of additional hospital visits and healthcare expenses, decreased work productivity and missed workdays. Diesel pollution disproportionately impacts communities in freight corridors, which are largely low-income, Black, Indigenous, Latino and other communities of color. We cannot afford to sink state resources in old, inefficient, and polluting diesel technology, especially during our worsening air quality crisis.
- **Reduced climate emissions:** According to a 2021 report commissioned by the Colorado Energy Office, "only very modest reductions have been achieved in GHG [greenhouse gas] emissions with newer [medium- and heavy-duty] vehicles, with some categories actually having higher emissions than pre-2000 vehicles." With transportation being the leading source of climate pollution in the state and the impacts of climate change putting our communities at risk, it is unacceptable to spend millions of dollars on vehicles that continue to emit high levels of greenhouse gas emissions. All-electric trucks, on the other hand, offer tremendous reductions in carbon emissions and will only

**Regulatory action is critical.** Finally, Colorado has the ability to transition tens of thousands of dirty diesel trucks to cleaner engines through regulatory action and shouldn't squander limited public dollars to do so. The State has committed to undertaking the Low NOx Heavy Duty Omnibus rulemaking within the next year, which will slash NOx and particulate matter emissions from heavy duty trucks. California has adopted this rule as a critical step in meeting federal ozone standards; Massachusetts and Oregon have already followed suit with adoption in 2021 and Washington has proposed adoption this year. Colorado should swiftly adopt the Low-NOx rule to transition diesel trucks to cleaner models, while using State funding to accelerate fleets to all-electric ahead of the necessary full-scale transition to electric trucks.

**We the undersigned urge the legislature to make the best use of State funding in addressing our air pollution crisis by incentivizing a shift to all-electric trucks, instead of doubling down on polluting diesel.** We are in strong support of air quality investments overall. If it is not possible to limit this funding solely to electric trucks, we recommend the funding be directed to other valuable programs within the air quality package.

Natural Resources Defense Council

Healthy Air and Water Colorado

Mi Familia Vota

Colorado Sierra Club

CoPIRG (Colorado Public Interest Research Group)

Western Resource Advocates

E2- Environmental Entrepreneurs

Southwest Energy Efficiency Project (SWEET)

Conservation Colorado

Womxn from the Mountain