

California Legislature

November 27, 2019

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Trucks Regulation

Dear Chair Nichols and Board Members,

Over the past three years, CARB has been working on the Advanced Clean Trucks (ACT) rule that will require truck manufacturers to sell electric vehicles in California. This proposal is modeled after the state's Zero Emission Vehicle (ZEV) Program, requiring carmakers to develop electric vehicles and make them available for California consumers. By setting targets for manufacturers to produce and sell light-duty, zero-emission vehicles, California kickstarted the electric car revolution. Since December 2011, when the first zero-emission car came to market, sales of all-electric cars have exceeded 600,000¹ in the state; by strengthening this rule, CARB can do the same for trucks. If the rule is strengthened to 15 percent of trucks on the road by 2030, such targets could transform the truck sector from one fueled by diesel to one powered by electricity and hydrogen.

Unfortunately, CARB staff's proposed recommendations falls woefully short of an impactful goal. This proposal would result in ²electric trucks growing to only about 4 percent of trucks in the state, or 75,000 trucks on California roads by 2030. This proposal does not address the environmental concerns of California communities. The rule needs to be more ambitious if the state is going to meet statewide gas reduction goals. **Improving local air quality and reducing California's contribution to global warming will require more than 4 percent of trucks to be zero-emission by 2030.**

Public workshops for the ACT rule first began in 2016, since then numerous companies and manufacturers have taken steps towards truck electrification. This progress shows that electric trucks are here and will continue to diversify the market. Manufacturers Bluebird, BYD, Chanje, Lightning Systems, Lion Electric, GreenPower, Kalmar Ottawa, Motiv, Phoenix Motorcars, and others are all offering commercially available Class 3-8 electric trucks and vans³. Further, nearly all conventional heavy-duty truck manufacturers have electric demonstration vehicles or have announced plans for commercialization. Recently, Amazon ordered 100,000 electric delivery trucks.

¹ <https://www.veloz.org/sales-dashboard/>

² <https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantucks>

³ <https://ww2.arb.ca.gov/sites/default/files/2019-03/190402actpres.pdf>



A stronger standard will help grow the market and create good jobs. The California Public Utilities Commission approved investments in heavy-duty electric charging infrastructure for all three major private electric utilities in the state, supporting at least 18,000 heavy-duty electric vehicles and equipment by 2025. Statewide training initiatives like the Electric Vehicle Infrastructure Training Program⁴ are already preparing California electricians for the shift to clean transportation technologies.

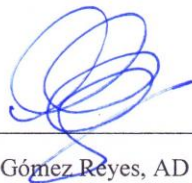
In addition to adding jobs and career paths to the economy, the need for electric trucks is increasing. Global warming emissions from heavy-duty vehicles in California have shown no decline and air pollution⁵ across the country has increased over the last two years. In the South Coast Air Basin, ozone levels⁶ have exceeded the 2015 National 8-hour standard (0.070 ppm) for more than 120 days each of the last four years.

The broad participation by numerous community, environmental justice, health and labor groups at the ACT workshops should have demonstrated the importance of a stronger rule and the support for a more ambitious proposal. **We urge staff to strengthen the proposal by increasing the overall mandates to ensure that by 2030 no less than 15 percent of medium and heavy-duty trucks on the road are zero-emitting.**

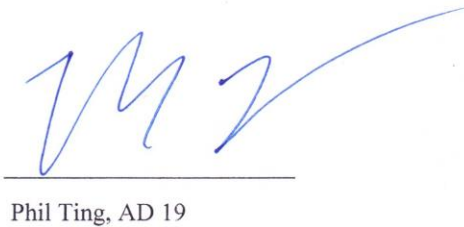
Raising the standard to achieve 15 percent of electric trucks on the road by 2030 would result in 250,000-300,000 electric trucks being utilized across sectors. Increasing the overall mandate for more zero-emission trucks on the road is critical for California to finally meet healthy air quality standards, especially in disproportionately impacted environmental justice communities. The health, economic, and environmental benefits from a stronger rule are undeniable and long overdue.

We urge you to strengthen the Advanced Clean Trucks rule to ensure at least 15 percent of the trucks on the road by 2030 will be zero emission, to create tangible public health, climate and economic benefits in California.

Sincerely,



Eloise Gómez Reyes, AD 47



Phil Ting, AD 19

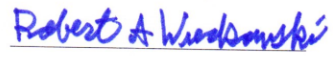
⁴ <https://evitp.org/>

⁵ <https://www.washingtonpost.com/business/2019/10/23/air-pollution-is-getting-worse-data-show-more-people-are-dying/>

⁶ https://www.arb.ca.gov/aqmis2/ozone_annual.php



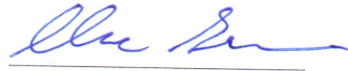
Benjamin Allen, SD 26



Bob Wieckowski, SD 10



Luz Rivas, AD 39



Marc Berman, AD 24
