

November 12, 2019

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

RE: Support for a stronger Advanced Clean Trucks standard

Dear Chair Nichols and Members of the Board,

We are writing in support of significantly strengthening the proposed Advanced Clean Trucks (ACT) standard. Our analysis at the Union of Concerned Scientists (UCS) has found that the proposed standard would result in just 4 percent of trucks on the road in California being zero-emission vehicles by 2030. We stand with more than 15 other organizations in calling for a standard that achieves a 15 percent on-road deployment by 2030.¹ While more ambitious than CARB's current proposal, we believe a standard of this level is achievable with today's technology and necessary to address the consequences of vehicle pollution and a warming planet.

You may know that 2019 marks the 50th Anniversary of UCS. What began as a campus movement at the Massachusetts Institute of Technology many years ago has grown into a national organization committed to science for a healthy planet and safer world. Our mission is to use rigorous, independent science to solve our planet's most pressing problems. We have worked for many years in California on issues related to climate, energy, and clean transportation.

A strong ACT standard is supported by our organization's work and values. UCS research consistently points to the need for strong action on climate and reducing transportation emissions. Our scientific analyses have shown dire consequences of inaction such as off-the-charts heat across the country as outlined in our *Killer Heat in the United States* report and increased chronic disruptive flooding due to sea level rise as outlined in our *When Rising Seas Hit Home* report.²

Furthermore, our report on *Inequitable Exposure to Air Pollution from Vehicles in California* found that Latinos, African Americans, Asian Americans and low-income communities are exposed to substantially more air pollution from vehicles than other demographics in California.³ These communities, often located near freight hotspots such as ports, highways, and railyards, are disproportionately harmed by truck pollution and have long called for increased deployment of zero-emission technologies. Diesel emissions from trucks have significant negative impacts on human health. Studies have shown air

¹ Comments on Proposed Advanced Clean Trucks (ACT) Regulation. October 15, 2019. Comment Log for Informal comments received by interested stakeholders. www.arb.ca.gov/lists/com-attach/12-cleantrucks-ws-AmNcPIQjUmBVPQdk.pdf

² a) Dahl, K., E. Spanger-Siegfried, R. Licker, A. Caldas, J. Abatzoglou, N. Mailloux, R. Cleetus, S. Udvardy, J. Delet-Barreto, P. Worth. 2019. *Killer Heat in the United States*. Cambridge, MA: Union of Concerned Scientists. www.ucsusa.org/sites/default/files/attach/2019/07/killer-heat-analysis-full-report.pdf

b) Spanger-Siegfried, E., K. Dahl, A. Caldas, S. Udvardy, R. Cleetus, P. Worth, N. Hernandez Hammer. 2017. *When Rising Seas Hit Home*. Cambridge, MA: Union of Concerned Scientists. www.ucsusa.org/sites/default/files/attach/2017/07/when-rising-seas-hit-home-full-report.pdf

³ Reichmuth, D. 2019. *Inequitable Exposure to Air Pollution from Vehicles in California*. Cambridge, MA: Union of Concerned Scientists. www.ucsusa.org/sites/default/files/attach/2019/02/cv-air-pollution-CA-web.pdf

pollution increases the risk of asthma attacks, heart attacks, cancers, premature death and more.⁴ The need for electric trucks is increasing, particularly as California communities continue to experience the nation's worst air quality and global warming emissions from heavy-duty vehicles in the state have shown no decline in the past six years (2012-2017).⁵

A more ambitious standard is feasible with today's technology. Since public workshops on this standard first began in 2016, UPS and FedEx have each ordered 1,000 electric delivery trucks; Amazon has ordered 100,000 delivery trucks; and manufacturers from Tesla to BYD, Daimler, Volvo, Motiv, Lightning Systems, Lion, Xos Trucks, Toyota and more have made vehicles that are either in customers hands or undergoing testing towards that goal. The Ports of Los Angeles and Long Beach committed to all zero-emission drayage trucks (roughly 15,000 trucks) by 2035.⁶ And the California Public Utilities Commission approved nearly \$700 million of 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 2025.⁷

We urge CARB staff to strengthen the ACT standard by:

- (1) Increasing sales requirements in all classes of heavy-duty trucks ensuring no less than 15 percent of trucks on the road are zero-emission by 2030;
- (2) Including Class 2b pickup trucks in the standard beginning in 2024;
- (3) Outlining CARB's longer-term objectives for achieving 100 percent zero-emission trucks in various categories, and explaining how this standard is consistent with attaining state and federal air quality and climate targets; and
- (4) Committing to adopt corresponding fleet purchase requirements in 2021.

California cannot miss the opportunity to take strong action now. This rule will help usher our heavy-duty transportation sector towards a zero-emission future and set a precedent across the country and world. Thank you for considering our recommendations.

Sincerely,

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⁴ American Lung Association. 2019. State of the Air. www.lung.org/assets/documents/healthy-air/state-of-the-air/sota-2019-full.pdf

⁵ a) *Id*

b) California Air Resources Board. 2019. California Greenhouse Gas Inventory for 2000-2017. ww3.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_sum_2000-17.pdf

⁶ Port of Los Angeles and Port of Long Beach. 2017. San Pedro Bay Ports Clean Air Action Plan 2017. <https://cleanairactionplan.org/documents/final-2017-clean-air-action-plan-update.pdf/>

⁷ California Public Utilities Commission. 2019. Transportation Electrification Activities Pursuant to Senate Bill 350. www.cpuc.ca.gov/sb350te/