



September 16, 2021

**VIA EMAIL**

Chair Randolph and Members of the Board  
California Air Resources Board  
California Climate Investments  
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**Re: Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan**

Dear Chair Randolph and Members of the California Air Resources Board:

On behalf of the Los Angeles County Electric Truck and Bus Coalition, we submit this comment on the Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan (Fourth Investment Plan). We applaud the California Air Resources Board (CARB) for its commitment to creating and sustaining good jobs and reducing emissions through California's Climate Investments.

Transportation makes up a significant portion of greenhouse gas emissions in our state. The public health consequences of emissions from combustion of carbon-based fuels are difficult to ignore— with higher rates of asthma, stroke, heart attack, cancer, obesity, diabetes, mental health issues and cognitive decline all linked to the resulting particulate pollution<sup>1</sup>. In the Fourth Investment Plan, our coalition urges CARB to increase its investments in electrifying school and transit buses, refuse trucks, drayage trucks, transportation refrigeration units, and off-road equipment. We further ask that CARB adopt jobs policies such as the US Employment Plan (USEP) and the Electric Vehicle Infrastructure Training Program (EVITP) to ensure that our state creates good jobs while reducing GHG emissions.

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<sup>1</sup> Particle Pollution, American Lung Association (last updated April 20, 2020) <https://www.lung.org/our-initiatives/healthy-air/outdoor/air-pollution/particle-pollution.html>

The Los Angeles County Electric Truck and Bus Coalition is made up of labor, environmental and community organizations committed to ensuring heavy and medium duty fleets are 100% zero emissions, disadvantaged communities are first to see the emissions reduction and jobs benefits of electrification and that we create good, family sustaining jobs through our investments. Our coalition successfully advocated for the Los Angeles Metropolitan Transportation Authority and the Los Angeles Department of Transportation to convert their entire transit bus fleets to 100% zero emissions by 2030 and implement the US Employment Plan Policy when procuring electric transit buses. Our coalition also secured commitments from the Los Angeles Sanitation Department to convert its refuse truck fleet to 100% zero emissions by 2035. These successes were built upon our resolve to ensure that targeted investments from multiple sources propel the zero-emissions transformation of heavy and medium duty fleets to help our region improve its air quality.

## **I. We Support Investments in Zero-Emissions Off-Road Projects**

We are pleased to see that recommended investment priorities include funding for demonstrations of zero-emissions off-road equipment and vehicles, including marine vessels and locomotives. State funding for zero-emissions off-road projects has lagged— particularly in those categories where strong pollution controls are lacking such as rail, harbor craft, cargo equipment and ocean-going vessels. The rise of freight activity due to e-commerce has only exacerbated the disproportionate impact felt by communities living near freight hubs like the ports, rail yards and warehouses. More funding is needed to advance zero-emissions technology development in this sector while CARB and local agencies continue to develop rules to rein in the biggest polluters.

## **II. Targeted Investments in Zero-Emission Buses and Trucks Will Support Successful Transitions to 100% Zero Emissions Fleets and Reduce Emissions in Environmental Justice Communities**

We support the Fourth Investment Plan's focus on investments in zero-emissions technologies for buses, ferries, passenger locomotives and supporting infrastructure. We also encourage CARB to include additional investments in targeted categories of medium- and heavy-duty zero-emission buses and trucks, so that we can achieve wide-scale deployments of zero-emission vehicles within the next few years.

CARB's separate 2021-22 funding plan for Clean Transportation Incentives (Transportation Incentive Plan) will support large-scale zero-emission deployments of 1,000 school buses, 1,000 drayage trucks and 1,000 transit buses, and the Fourth Investment Plan can complement this funding nicely. The funding in the Transportation Incentive Plan is critical to achieving the goals of the Advanced Clean Fleet (ACF) Rule and the Innovative Clean Transit Rule, and the Fourth Investment Plan offers an important opportunity to achieve even greater progress on the state's climate goals in fiscal years 2022 through 2025. Therefore, we would like to see funding in the Fourth Investment Plan support wide-scale adoption of heavy- and medium-

duty zero-emissions technologies, including school buses, drayage trucks, transit buses, refuse trucks, and TRUs.

Additional investment in zero-emission school buses will help further reduce emissions and improve bus driver, community and student health. Funding for zero-emission drayage trucks is critical if we are going to meet the 100% by 2035 requirement under the ACF rule. On top of this, cleaning up drayage trucks also advances important equity principles, since combustion-powered drayage trucks contribute to the dirty air crisis in portside communities. To be effective, however, CARB's investment plan for drayage trucks should be broad enough to include trucks that transport goods between warehouses and distribution centers in addition to trucks going in and out of ports and railyards— thus helping to promote the use of cleaner technology in communities hit hardest by the goods movement sector.

We would also like to see additional funding to support transit agencies as they transition to 100% zero-emission transit operations. As the State continues to recover from the COVID-19 pandemic, local transit agencies need additional support to overcome pandemic-related losses. The Fourth Investment Plan can help boost efforts to advance the state's clean air goals, and transition fleets even as regional recovery efforts are underway.

In addition, our coalition would like to see specific funding for the deployment of zero-emissions refuse trucks and TRUs. Refuse trucks and TRUs are highly polluting heavy-duty vehicles that emit significant pollution in all our communities but have especially negative impacts on disadvantaged communities burdened by crisscrossing layers of pollution from multiple sources. Electric refuse trucks are primed for electrification, and a recent report by CARB even shows that battery electric refuse trucks have a lower total cost of ownership compared to diesel, natural gas, and fuel cell electric models from day one.<sup>2</sup> Investing in electric refuse trucks can help support a large adoption of these trucks, which can bring clean air to every street in California.

CARB should also fund the deployment of zero-emission TRUs that are not already covered by the zero-emission mandate of CARB's TRU regulation. Specific funding for deployment of zero-emission TRUs will help clean the air in our communities.

Funding for all these categories of trucks will advance the dual priorities of targeting investments to support disproportionately impacted communities and driving progress towards large-scale deployment of zero-emissions fleets.

### **III. Adoption of the US Employment Plan Could Create Thousands of Jobs in California**

The US Employment Plan (USEP) is a highly customizable, federally approved policy that builds good jobs and equity into the public purchasing process. The USEP incentivizes

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<sup>2</sup> Draft Advanced Clean Fleets Total Cost of Ownership Discussion Document, California Air Resources Board (September 9, 2021), [https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc\\_ADA.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc_ADA.pdf).

companies competing for public contracts to disclose the number, type, and location of jobs the contract will create and retain, as well as salaries, benefits, training programs, and their plan to recruit and train historically marginalized workers. These commitments are then scored by the contracting agency and additional points are awarded to the bidders depending on the robustness of their US Employment Plan proposal. Once the bidder wins the contract, their USEP commitments become part of the executed contract with the agency.

The USEP has been adopted by transit agencies across the country including the Los Angeles Metropolitan Transit Authority, the Chicago Transit Authority, the New York Metropolitan Transit Authority and Amtrak. Los Angeles Metro has used the USEP on eight procurements for buses and railcars which resulted in the creation of 550 direct manufacturing jobs and thousands of additional jobs throughout the supply chain.

California transit agencies are mandated to transition their bus fleets to 100% zero emissions by 2040, and there are four major electric transit bus manufacturers in California. Furthermore, three out of the four manufacturers are unionized and two have made specific commitments to creating pathways to good jobs for disadvantaged communities. There is a huge opportunity to create and sustain thousands of jobs in bus manufacturing, especially for communities facing significant barriers to employment and environmental justice communities. Every \$1 million invested in battery operated transit buses creates 5.7 direct and indirect jobs. Transitioning every transit bus in California could result in the creation of thousands of good manufacturing jobs in our state. Transit agencies are already turning over their transit bus fleets to zero emissions to meet the state's goals and ARB must act quickly to take advantage of these investments.

#### **IV. Requiring Electric Vehicle Infrastructure Training Program (EVITP) Certification Increases Job Safety**

The Electric Vehicle Infrastructure Training Program provides training and certification for electricians installing electric vehicle supply equipment. The curriculum was developed in collaboration with automobile manufacturers, utilities, energy storage device manufacturers, electrical contractors, the national fire protection agency and electrical workers. The training program is offered at Electrical Industry Training Centers and Community Colleges across the country.

Charging infrastructure installation is a necessary step in the transition to zero emissions vehicles. But improperly installed charging stations pose a serious fire threat, especially in the installation of high voltage infrastructure. EVITP certification ensures that installers are highly skilled in responding to conditions that require special installation procedures while meeting manufacturer specifications. Additionally, EVITP certification can help reduce the likelihood of injuries and electrical fires due to improper installation.

The Air Resources Board has an incredible opportunity to accelerate the adoption of zero emissions vehicles and to create good, safe jobs in California. We hope that the final investment plan outlines specific ways in which our Climate Investments can be leveraged to create

economic and emissions reduction benefits, especially for communities who have faced the brunt of climate change.

Sincerely,

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