



October 15, 2019 | Submitted Electronically

Mr. Jack Kitowski, Division Chief
Mr. Tony Brasil, Branch Chief
Mr. Craig Duehring, Manager
Mr. Paul Arneja, Air Resources Engineer
Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Comments on Proposed Advanced Clean Trucks (ACT) Regulation

Dear Mr. Kitowski, Mr. Brasil, Mr. Duehring and Mr. Arneja:

On behalf of over 13,000 members of the International Brotherhood of Electrical Workers throughout San Diego, Imperial and Los Angeles Counties and NECA Los Angeles electrical contractors, we join community, environmental justice, health and fellow labor unions in urging the California Air Resource Board (CARB) to adopt a strong and ambitious Advanced Clean Truck Rule. We believe the draft proposal falls far short on both what is possible and what is needed and urge staff to strengthen the proposal by:

- (1) 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;
- (2) Including Class 2b pickup trucks in the mandates beginning in 2024;
- (3) Outlining CARB's longer-term objectives for achieving 100 percent zero-emission trucks in various categories, and explaining how this phase of the rule is consistent with those objectives and attaining federal and state air quality and greenhouse gas objectives; and
- (4) Committing to adopt corresponding fleet purchase requirements in 2021.

Transportation represents 41% of greenhouse gas emissions in California.ⁱ As stated in SB 350 The Clean Energy and Pollution Reduction Act of 2015, “reducing emissions of greenhouse gases to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 will require widespread transportation electrification.” Working families are already experiencing devastating impacts from climate change. Additionally, California has some of the most polluted air in the nation. If we are to avert the worst impacts of a climate disaster and improve air quality, we need strong and aggressive action to reduce pollution from transportation.

Electrifying trucks also has the potential to generate high-quality jobs, skilled training opportunities and new investments in California’s economy. For example, statewide training initiatives like the Electric Vehicle Infrastructure Training Program are preparing California electricians for the shift to clean transportation technologies. In fact, IBEW electricians have already installed charging infrastructure for medium-duty electric trucks in Southern California.

A strong Advanced Clean Truck Rule is a win for workers, public health and our climate and we join with our coalition allies in urging staff to reconsider its draft proposal and release a stronger version later this month.

Sincerely,

Jeremy Abrams
Business Manager
IBEW Local 569

Jennifer Kropke
Director of Environmental and Workforce Engagement
IBEW, Local 11 & National Electrical Contractors Association Los Angeles County, LMCC

ⁱ2019 Edition, California Greenhouse Gas Emission Inventory: 2000 – 2017, CA Air Resources Board;
<https://ww2.arb.ca.gov/ghg-inventory-data>