
From: Jim Neal <jim_neal@msn.com>
Sent: Wednesday, October 12, 2022 1:28 PM
To: Segall, Craig@ARB
Cc: ARB Clerk of the Board
Subject: Healthy communities are more important than dirty delivery trucks

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Dear Chair Randolph and Members of the Board,

Thank you for your work in developing the Advanced Clean Fleets ("ACF") thus far.

Diesel trucks are one of the fastest growing sources of greenhouse gas emissions, the largest source of California's NOx pollution, and the largest source of air pollution disparity in the United States. Without immediate action, the freight industry's rapid growth means pollution burdens will worsen, especially for low-income communities of color.

Delivery vehicles have become part of our daily lives. All over the world, they clog up our streets, take up space on our already congested roads and pollute the air we breathe – and the situation is getting worse. The Covid-19 pandemic normalized same-day and next-day deliveries, and the inexorable rise of online shopping means the delivery industry is only likely to grow – the United States is currently the second biggest e-commerce market in the world, and is expected to grow to a staggering US\$1.3 trillion by 2025.

The ACF is critical to addressing California's climate and environmental justice crises associated with this boom in e-commerce, and beyond. Strengthening the ACF rule is one of CARB's most critical opportunities to a pathway that meets Governor Newsom's Executive Order, the targets in the Mobile Source Strategy, and our health and climate needs. The rule also sets precedent for the rest of the country - an opportunity that cannot be missed.

I urge the Board to adopt ACF Alternative 2 to require 100% ZE sales by 2036 and to lower the High-Priority Fleets threshold to fleets of 10 trucks or more. As CARB Staff's analysis confirms, adopting Alternative 2 is feasible and will lead to critical emission reductions. In addition, I urge the Board to accelerate the transition for Class 7-8 tractors, because these are some of the most polluting vehicles out there.

California is far from attainment in the most polluted air basins in the nation and from meeting the 2030 climate targets. Meanwhile, emissions from freight are rising and new warehouses and logistics centers sprout almost weekly, consuming the land and air around low-income communities of color. Even more dramatic reductions are needed to fulfill CARB's obligations, but anything less than Alternative 2 imperils the chances of doing so.

Alternative 2 delivers substantially greater emission reduction benefits at little additional cost. CARB staff's assessment demonstrates that advancing the 100% sales requirement to 2036 and lowering the fleet threshold to 10 or more trucks would greatly speed the delivery of ZE trucks. These components will add earlier and larger reductions in nitrogen oxide (NOx), fine particulates (PM2.5), and greenhouse gases (GHGs), and avoid thousands of additional deaths and hospitalizations. Benefits from Alternative 2 include:

- Over 130,000 more ZE trucks in 2050;
- 43% greater reduction tons of NOx;
- 40% greater reduction in MMT of CO2
- \$25.9 billion in additional health benefits
- Over 2,500 avoided premature deaths
- Over \$25 billion in additional health benefits

The pace of progress in the zero emission truck sector is promising with even more favorable research published as well as new announcements for investment in battery and vehicle manufacturing, charging infrastructure, and large purchase orders. Stronger regulations will speed the maturation of a market that is already growing.

Even with the changes we are calling for, the ACF will not guarantee the level of ZE truck deployments necessary to achieve our air and climate targets. But, the stronger alternative will not only bridge the gap to our targets but build the signals and momentum necessary to reach earlier tipping points that unlock greater progress.

As you know, the Clean Air Act waiver allows California to adopt stronger standards than those of the federal government and set the precedent for the rest of the country on how to mitigate vehicle emissions. California can achieve and even exceed current commitments, and set the stage for other states to follow suit. The fate of our air quality and the planet depends on this outcome, which CARB has the unique ability to influence. I urge you to use your power to ensure that our streets are for people, not pollution.

Thank you,
Jim Neal

cc: Clerk of the Board Clerk of the Board