

December 9, 2019

Chair Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Truck Rule

Dear Chair Nichols and Members of the Board,

We, the undersigned organizations and partners, write this letter to express our grave concerns on the current status of the Advanced Clean Truck Rule (ACT) that your staff at the California Air Resources Board presented on October 22, 2019. We are disappointed with the lack of ambition and goals that have been set forth to tackle our air pollution crisis. As long-time residents in communities that are severely impacted by pollution, specifically diesel toxics from freight operations, we do not feel as if that reality is reflected in the current rule-making.

Currently, 1.9 million trucks are on California's roads - many of which drive through communities like ours. On any given day, we see upwards of hundreds of medium and heavy-duty trucks passing behind our homes, in front of our parks, next to our schools, spewing diesel pollutants on us, per hour. This number of truck trips substantially increases when we enter 'peak season' during the holidays, as we are enduring currently. These types of freight operations coupled up with historically, negligent land use decisions and unregulated growth has left many families living in air basins that have not been in attainment for decades in California - with African American and Latinx communities breathing in 40% more of that particulate matter.¹ These communities have among the highest rates of pediatric asthma due to their proximity to diesel sources of pollution. Acting ambitiously because there is the understanding that low-income and communities of color have been absorbing the costs of pollution with their health for far too long, is a start in reconciling disparities found in these historically, marginalized and polluted communities. Thus, our communities demand more from the California Air Resources Board.

The current rule proposal would only aim to ensure 4% of trucks on the road are converted to zero-emission by 2030. This translates to about 75,000 for the entire State of California in ten years! We reflect on the constant sights of black smoke that fills our skies when freight traffic piles up on our streets, the tail-pipe emissions that leave a trail for us to follow and question how this rule would impact this reality? Given that prominent private-sector players such as Amazon.com bring an estimated 21,500 diesel truck loads of merchandise to and from 21 Amazon warehouses in the four-county region of just Los Angeles, Orange, San Bernardino and Riverside County per day² and the Southern California Association of Governments (SCAG)

¹ <https://blog.ucsusa.org/dave-reichmuth/pollution-california-people-of-color-bear-burden>

² <https://economicrt.org/publication/too-big-to-govern/>

“estimates that there will be an increase of 24,000 trucks/day to 53,000 trucks/day on the I-710, an 80% increase in truck vehicle-miles-traveled (VMT)³ by 2035. When we compare the 4% target of 75,000 trucks for the entire State of California by 2030 to the amount of the freight operations currently running through our communities, just in the Southern California region, we can confidently state that this target will not address the public health crisis we are in.

“My father is a truck driver and has been working as one for more than 6 years, therefore not only does this [air pollution] affect me, my friends and family who are breathing this air - but it also affects my father on a different level because he is in the trucks for days, sleeping in his truck, taking the little breaks that he can outside, where it is polluted” - Kimberely Chavez, CCAEJ

Our communities understand that feasibility is not an issue when it comes to this topic. We know that any and all must be done because the lives of so many depend on it. Our homes, schools, and businesses have been sacrifice zones for industry profits. When costs are considered, our lost wages and healthcare - and consequently our quality of life - is rarely taken into account. That is why we cannot accept lax measures when stronger action can and should be taken.

With pressing climate crisis affects being felt today, there is no time to revisit these goals in ten years. Especially as emissions from the transportation sector continue to increase as the Country’s largest source of greenhouse gasses. We need bold leadership now to set the stage, stimulate the market and bring us into a healthier future.

We demand that the Board:

1. Increase the mandate target so that no less than 15% of trucks on the road are zero-emission by 2030.
2. Begin sales target for class 2b-3 pickup trucks in 2024
3. Articulate when our communities can expect all truck sales must be 100% zero-emission. This long-term policy goal allows for up-front planning and adaptation for energy adaption and electrification infrastructure deployment.
4. Accelerate the development of the CARB fleet rule for adoption in late 2021

The ACT Rule must put the State of California on an ambitious trajectory towards full electrification of our transportation system. For far too long, low-income and communities of color have absorbed the externalities of the freight industry. We need CARB to make a strong commitment to strengthening the rule language and adopt higher standards for the health and safety of our communities.

³ http://www.freightworks.org/DocumentLibrary/Final_GMInfographics2013_R8.pdf

Sincerely,

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