STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0115

California Legislature

May 7, 2020

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

RE: Advanced Clean Trucks standard

Dear Chair Nichols and Board Members,

We call on the state to take strong action on electric trucks in the Advanced Clean Trucks standard. Over the past three years, the California Air Resources Board (CARB) has worked on the Advanced Clean Trucks standard to require truck manufacturers to sell electric vehicles in California. The Advanced Clean Trucks standard is the first sales policy for electric trucks in the country and the world and would set a precedent for other states and countries to follow.

This proposal is modeled after the state's successful Zero Emission Vehicle (ZEV) Program, requiring carmakers make electric passenger vehicles available for California consumers. By setting targets for manufacturers to produce and sell light-duty, zero-emission vehicles, California kickstarted the electric car revolution. Today, zero-emission vehicles are one of California's largest exports.[1]

The transportation sector is the largest emitter of global warming pollution in both California and the United States. Trucks and other heavy-duty vehicles are disproportionately polluting: they make up only 7 percent of vehicles in California, yet are responsible for 20 percent of global warming emissions, 40 percent of NO_x emissions, and 27 percent of $PM_{2.5}$ emissions from the transportation sector.[2] Global warming emissions from heavy-duty vehicles in California have shown no decline over the last 6 years.[3] In the Los Angeles region (South Coast Air Basin),

[1] https://www.forbes.com/sites/energyinnovation/2019/09/23/california-electric-vehicle-exports-already-valued-at-3-billion-in-2018-expected-to-hit-35-billion-in-2019/#1ca61e954e27

[2] Chandler, S., J. Espino, and J. O'Dea. 2016. Delivering opportunity: How electric buses and trucks can create jobs and improve public health in California. Cambridge, MA: Union of Concerned Scientists. www.jstor.org/stable/resrep17234

[3] California Air Resources Board. 2019. California Greenhouse Gas Inventory for 2000-2017. ww3.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scoping-plan_sum_2000-17.pdf (b) U.S. Environmental Protection Agency. 2019. Sources of Greenhouse Gas Emissions. https://www.epa.gov/ghgemissions/sources-green-house-gas-emissions

ozone levels have exceeded the 2015 National 8-hour standard (0.070 ppm) for more than 120 days each of the last four years.[4]

Late last year, we joined dozens of environmental, labor, health, and community organizations that made public comments calling for stronger sales targets that would result in at least 15 percent of trucks on the road being zero-emission by 2030. We are also aware of the recent Lawrence Berkeley National Lab study that found 20 percent of trucks on the road must be zero-emission by 2030 to reach the state's 2045 climate neutrality goal. Given these considerations, we applaud the Board's direction to staff to strengthen the rule and believe the final proposal is a significant step towards achieving health and climate goals. We also support the Board in setting long-term targets for transitioning heavy-duty vehicles in the state to zero-emission technologies. Such targets will be critical to guide additional policies that ensure the heavy-duty vehicle sector transitions from one fueled by diesel to one powered by electricity and hydrogen.

Public workshops for the ACT rule first began in 2016, since then numerous companies and manufacturers have taken steps towards truck electrification. As of November 2019, there were 27 different manufacturers with 70 different models of zero-emission trucks and buses available today or within the next two years. Battery and fuel cell electric offerings span Class 2b to Class 8 trucks and buses and include vehicles from new entrants such as Proterra, Tesla, BYD, and Rivian to established OEMs such as Daimler, Volvo, and Navistar. Many electric trucks are on the road or on order. As of October 2019, California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project has awarded vouchers for the purchase of 2,700 zero-emission trucks and buses across vehicle categories.[5] **But a strong standard is needed to take the electric truck market from one of pilot projects and press releases to one that can support a widescale shift from combustion technologies to electric technologies.**

Infrastructure investments and policies are underway to support the transition to electric trucks. The California Public Utilities Commission approved 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. Electricians are ready to build the infrastructure to support electric trucks *today* and statewide training initiatives like the Electric Vehicle Infrastructure Training Program[6] continue to prepare California electricians for the shift to clean transportation technologies.

Strengthening the sales standard for manufacturers is critical for California to act on climate and meet air quality standards, especially in communities disproportionately impacted by air pollution. The health, economic, and environmental benefits from a stronger standard are undeniable and long overdue. By setting a strong standard California will also set a precedent for many others to follow.

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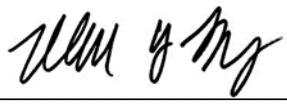
[4] https://www.arb.ca.gov/aqmis2/ozone_annual.php

[5] O'Dea, J. 2019. Ready for Work: Now Is the Time for Heavy-Duty Electric Vehicles. Cambridge, MA: Union of Concerned Scientists. https://www.ucsusa.org/sites/default/files/2019-12/ReadyforWorkFullReport.pdf

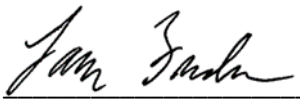
[6] https://evitp.org/

Sincerely,

Eloise Gómez Reyes, AD 47

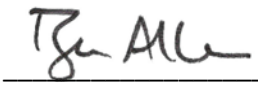


Phil Ting, AD 19



Laura Friedman, AD 43

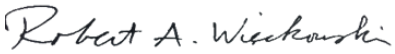
Luz Rivas, AD 39



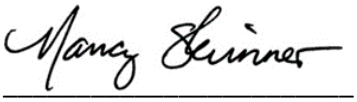
Ben Allen, SD 26

Henry Stern, SD 27

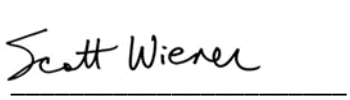
Marc Berman, AD 24



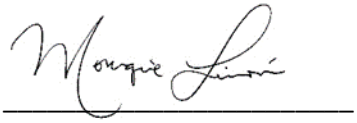
Bob Wieckowski, SD 10



Nancy Skinner, SD 9



Scott Wiener, SD 11



Monique Limón, AD 37