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CARB Board Meeting
Advanced Clean Trucks (ACT) Rulemaking
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Testimony of Lauren Navarro, Environmental Defense Fund (EDF):

Despite making up just 7 percent of vehicles on the road, MHDVs release 35% of total statewide NOx, 25% of statewide diesel PM emissions, which contribute to our lingering urban air pollution health problems, and 23% of all on-road GHG emissions which must be greatly reduced to achieve the state's GHG goals.

Fortunately, there is a solution for both of these looming crises: Zero-emission trucks. Zero-emission trucks will grow jobs in California as well: according to Forbes, electric vehicles are California's 8th largest export, worth even more than oil. There are 8 electric truck manufacturers in California. And, because Zero-emission technologies are two to five times as fuel efficient as conventional internal combustion engines, they lower the costs of truck ownership over time.

For all these reasons, we both support the existing ACT rule and want to see it made as replicable, effective, and successful as possible. Specifically, we offer 2 recommendations that we ask the board to consider:

- **First, include in the adoption Resolution direction to staff to develop an analysis for ZEV truck sales similar to the one CARB staff presented to the Board in July for passenger vehicles.** This presentation, titled "Critical Need for Actions to Accelerate the Transition to a Zero Emission Future" clearly showed the need to increase the rate of passenger vehicle sales of ZEVs to near 100 percent by 2035, in order to achieve an 80 percent reduction in GHG emissions by 2050. A similar plan will be necessary to guide the vision for trucks; and
- **Second, given the magnitude of the local and global problem of truck emissions, we ask that the Board consider where the percentages of ZEV trucks to be sold in each medium and heavy duty class can be strengthened and to adopt those higher percentages. One example would be to require pickup trucks in Class 2b/3 to be available in 2024, along the same timeline as all of the other classes of trucks, by eliminating their 3-year exemption.**

By taking these steps, the Board can reduce the very serious contributions of trucks make to air and climate pollution in California, while contributing to our economic growth.

Thank you for your time today.