

# Recommendations for the Advanced Clean Truck Proposed Rule

## Advanced Clean Truck Coalition - 9/6/19

We ask that CARB make the following changes to the currently proposed rule:

**1. Increase the percentage of sales requirements so that at least 15% of trucks on the road in 2030 are zero-emission**

- Current proposal – Would only require about 75,000 trucks to be zero-emission by 2030. This is only about 4% of the estimated 1.9 million trucks on the road today.
- Recommendation – The proposed sales targets should be strengthened to ensure **at least 15%** of the trucks on the road by 2030 will be zero emission, and to create a trajectory consistent with achieving 100% zero-emission trucks as required by e.g. 2040 (See recommendation #3 below.).
- The following *sales percentages is an example* of how this could be done:

Model Year	Class 2b-3 (including pickup trucks)	Class 4-8 Vocational/Straight Trucks	Class 7-8 Tractors	Yearly Zero-Emission Sales	Zero-Emission Vehicles On Road
2024	15% (11,235)	30% (6,275)	10% (608)	18% (18,117)	1.0% (18,117)
2025	23% (16,852)	38% (7,844)	13% (810)	25% (25,506)	2.3% (43,624)
2026	30% (22,469)	45% (9,413)	17% (1,013)	32% (32,895)	4.1% (76,518)
2027	38% (28,086)	53% (10,982)	20% (1,215)	40% (40,283)	6.3% (116,802)
2028	45% (33,704)	60% (12,551)	23% (1,418)	47% (47,672)	8.8% (164,474)
2029	53% (39,321)	68% (14,120)	27% (1,620)	54% (55,061)	11.8% (219,534)
2030	60% (44,938)	75% (15,689)	30% (1,823)	61% (62,449)	15.1% (281,983)
Cumulative sales	38% (196,605)	53% (76,874)	20% (8,505)	40% (281,983)	---

- The above example would result in 281,983 zero-emission trucks on the road by 2030, and cumulative zero-emissions sales of 40% between 2024 and 2030.<sup>1</sup>

<sup>1</sup> Sales numbers are based on numbers provided by the Engine Manufacturers Association to CARB and posted online at: <https://ww2.arb.ca.gov/sites/default/files/2019-02/190225actmarketanalysis.xlsx>. These estimates include total truck sales in California of 101,890 vehicles (Class 2b-3: 74,897; Class 4-8 vocational: 20,918; and Class 7-8 tractor: 6,075).

For simplicity, vehicle sales in future years do not include expected growth in the truck industry. If a constant growth in statewide truck population of 0.8% is assumed based on EMFAC 2017 projections, the example sales standard above would result in 300,000 trucks on the road, but this would still be 15% of the total truck population.

A total truck population (Class 2b-8) of 1,863,501 vehicles for calendar year 2018 was sourced from EMFAC 2017 and includes vehicles operating in California, whether registered in-state or out-of-state.

Information in the table above is based on the following vehicle sales and populations:

	<b>Class 2b-3</b>	<b>Class 4-8 Vocational/Straight Trucks</b>	<b>Class 7-8 Tractors</b>	<b>Total</b>
<b>Annual sales (EMA)</b>	74,897	20,918	6,075	101,890
<b>Population (EMFAC 2017 CY 2018)</b>	1,045,426	621,026	197,048	1,863,501

**2. Include zero-emission requirements for all truck classes beginning in 2024**

- Current proposal - Truck makers for Class 2B pickup trucks are not required to make any zero-emission trucks until 2027.
- Recommendation - All classes of trucks including pickup trucks must be required to have some zero-emission vehicle sales beginning in 2024.

**3. Clearly articulate CARB's goal for when all trucks must be zero-emission.**

- Current Proposal - CARB has not articulated its long-term policy goals regarding when various categories of trucks must be 100% zero-emissions, let alone a long-term trajectory of how CARB would get there. In the Innovative Clean Transit rule, CARB had a stated goal of 100% zero emission buses by 2040, which guided the 100% purchase standard in 2029, and the recently adopted Zero Emission Shuttle Bus rule requires all of these vehicles to be zero emission by 2035.
- Recommendation – CARB should articulate its goals to achieve when 100% of trucks should be zero emission e.g. by 2040. It should also consider setting dates certain by which all classes of truck sales must be 100% zero emission e.g. 2033, similar to what was done on the Innovative Clean Transit rule's requirement for a 100% purchase requirement beginning in 2029. CARB should also show how achieving these goals will ensure compliance with and mapping to federal and state criteria pollutant and GHG reduction requirements.

**4. Accelerate the development and implementation of the fleet rule.**

- Current status – CARB staff has stated that they do not plan to propose a fleet rule for Board consideration until 2022.
- Recommendation – CARB staff should accelerate the timeline so that the proposed subsequent fleet rule is adopted by July 1, 2021 and will be effective on January 1, 2024. Earlier adoption is necessary to support and drive the sales rule.