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

Dear Chair Nichols and Board Members,

SUPPORT FOR THE ADVANCED CLEAN TRUCKS STANDARD

This letter is to express our strong support for the proposed modified Advanced Clean Truck (ACT) regulation. The proposed standard is critical for enabling California to reach its climate and air quality goals and honor its commitment to equity.

California has made important strides in transitioning light-duty passenger vehicles away from fossil fuels and towards zero-emissions models, yet progress has remained flat for trucks and heavy-duty vehicles. As a result, trucks are responsible for an increasingly disproportionate share of the greenhouse gases emitted by the transportation sector. The outside impact of emissions from trucks is even greater for criteria air pollutants that directly affect human health.

The negative effects of air pollution from trucks are not distributed equally across all Californians; low-income communities and communities of color are more likely to be located along trucking routes and disproportionately bear the burden of unhealthy air quality. Due primarily to diesel emissions from trucks, neighborhoods along the I-710 corridor in Los Angeles experience a particular matter concentration that is on average 36 percent higher than the Los Angeles County overall average. *Portrait of Los Angeles*, a report released in 2017 that assessed well-being and access to opportunity for 106 cities and unincorporated areas of LA County using the American Human Development (HD) Index score, found that of 19 areas scoring below 4 on the HD Index, 13 are located along the I-710 corridor. Latinos and blacks make up between 90 to 99 percent of the population in these places. This illustrates how the implications of trucking emissions extend beyond climate and air quality goals. By perpetuating

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environmental injustices and compounding racial disparities, pollution from trucks presents a barrier to an equitable future for California.

As part of its efforts to address the urgent need to transition to zero emissions systems for transportation and goods movement, Los Angeles County is a member of the Transportation Electrification Partnership (TEP), an unprecedented multi-year partnership among local, regional, and state stakeholders to accelerate transportation electrification and zero emissions goods movement in Los Angeles. TEP is targeting 40 percent of all short haul and drayage trucks in the region to be zero emission by 2028, ensuring steady progress towards the San Pedro Bay Ports' Clean Air Action Plan commitment to transition the entire on-road drayage truck fleet serving the ports to zero emissions by 2035.

In the Los Angeles region and beyond, California is ready for a transition to zero emission trucking. There are 27 manufacturers that can provide 70 different models of zero emission trucks and buses now or within the next two years. Necessary infrastructure improvements are underway, with the California Public Utilities Commission recently approving investments for all three major private electric utilities in the state to support an estimated 18,000 heavy duty electric vehicles by 2025. However, this transition will not occur without a strong standard in place. The ACT regulation will send a clear market signal to facilitate the scaling up of the zero-emissions trucking industry. The proposed regulation is modeled on the state's Zero Emissions Vehicle (ZEV) program, which helped to kickstart the electric car revolution; today, zero emissions vehicles are one of California's largest exports. This proposed ACT regulation could provide a similar environmentally and economically transformative opportunity for the trucking industry in California.

The proposed ACT standard builds on California's tradition of leading the way and setting the standard for climate action that prioritizes equity and public health. I commend the Board's direction to staff to strengthen the ACT standard and urge the Board to approve the proposed regulation. As the Chief Sustainability Officer for LA County, I am committed to supporting the success of this standard and the work of the California Air Resources Board as we forge the path to our zero emissions future.

Sincerely,



Gary Gero
Chief Sustainability Officer