



May 28, 2020

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

Re: Comments on the Proposed Advanced Clean Truck Rule

Dear Chair Nichols and Members of the Board,

Thank you for the opportunity to provide comment on the California Air Resources Board's proposed Advanced Clean Truck Regulation (ACT). The Los Angeles County Electric Truck and Bus Coalition supports the strengthened ACT Regulation, and applauds the California Air Resources Board (CARB) for prioritizing the health of communities living along our polluted trade corridors, in our congested urban zones, and around our busy warehouse and port complexes. This regulation is a transformative opportunity to reshape California with the foundational values of clean air, family-sustaining jobs, and healthy communities as the bedrock of our zero-emission future. Our coalition is committed to the urgent work of electrifying all medium- and heavy-duty trucks in the Los Angeles region, and we urge CARB to adopt this vital regulation.

I. The Proposed 30-Day Changes Strengthen the ACT Regulation

Transportation is our number one emissions challenge in California: it directly causes 80 percent of ozone-forming nitrogen oxide (NOx) pollution and approximately 50 percent of greenhouse gases. Heavy-duty vehicles make up nearly half of the criteria air pollutant emissions in the greater Los Angeles region.¹ And the fuel to power these vehicles – the process of extraction, processing, and transporting diesel and natural gas – also emits toxic emissions every step of the way.

Even low levels of ground level ozone can cause irreparable harm, including permanent lung damage, asthma, heart attacks, strokes, heart disease, and developmental harm during pregnancy.² Particulate pollution triggers heart attacks, strokes, and asthma, causes cancer, exacerbates obesity and diabetes, and contributes to cognitive challenges, including Alzheimer's, dementia, and mental health disorders.³ Communities of color and low-income communities are exposed to substantially more cars, trucks, and buses than other demographic groups in California. We cannot afford to delay or pause efforts to move forward with this rule, particularly

¹ California Air Resources Board Mobile Source Strategy and SIP Measures, 2016

² U.S. Environmental Protection Agency, *Integrated Science Assessment for Ozone and Related Photochemical Oxidants*, 2013. EPA/600/R-10/076F.

³ <https://www.lung.org/our-initiatives/healthy-air/outdoor/air-pollution/particle-pollution.html>



at a time when the COVID-19 pandemic has further brought to bear the disproportionate impacts that dirty air has on disadvantaged communities.⁴

Our transportation system has been entirely dependent on polluting fossil fuels since the advent of the internal combustion engine. But today, for the first time in history, we have the ability to drive our modern world forward with zero-emission trucks, and the ACT regulation would be a key enabler in developing the supply of trucks to support widespread adoption of clean technology.

Now more than ever, millions of Californians need the State and government agencies to remain on track with efforts to clean the air, and we applaud CARB's commitment to enacting strong life-saving, zero-emissions regulations. Our communities are suffering and need zero-emissions today, and the important emission reduction targets set by the strengthened ACT Regulation are a vital step towards clean air. This pandemic has served to underscore the critical public health imperative to immediately electrify our transportation system, which will support the communities suffering most from this pandemic and the complicating factors of air pollution. As we all continue to work towards a near-term public health and economic solutions to the novel coronavirus crisis, it is also important that our state remains committed to the long-term solutions to the public health dirty air crisis.

II. The Strengthened ACT Regulation Will Create Much Needed High-Quality, Family-Sustaining Jobs in the Clean Energy Economy

Our Coalition supports building California's zero-emission transportation system as a pathway to the state's immediate economic recovery and revitalization. Investing in an equitable zero-emission system is vital to the public health of communities most impacted by the fossil fuel industry and the risk factors of COVID-19. Moreover, by focusing on building up California's zero-emissions transportation and increasing resources for more municipalities and transit agencies to prepare for vehicle electrification, we can train and employ disadvantaged workers for family-sustaining jobs and increase our capacity to move to fully electric fleets, while putting Californians back to work.

California has already demonstrated that it can create new, high-quality, family-sustaining jobs in the clean energy economy through regulations that require strong emission reductions and air quality improvements. For example, as of early 2020, California supported 275,600 direct electric vehicle industry jobs, including 119,200 in Southern California, where our coalition focuses our work. Importantly, these are good, family-sustaining jobs. In Southern California, jobs in the EV industry pay an average annual wage of \$80,900, well above the average annual wage across all industries of \$60,400.⁵

Our coalition has seen firsthand how manufacturing electric trucks and buses, investing in electric infrastructure, and coupling these investments with thoughtful jobs policies and training

⁴ Xiao Wu, Rachel C. Nethery, Benjamin M. Sabath, Danielle Braun, Francesca Dominici, Exposure to Air Pollution and COVID-19 Mortality in the United States, Department of Biostatistics, Harvard T.H. Chan School of Public Health (Apr. 5, 2020), available at https://projects.iq.harvard.edu/files/covid-pm/files/pm_and_covid_mortality.pdf. See also Tony Barboza, Does Air Pollution Make You More Susceptible to Coronavirus? California Won't Like the Answer, Los Angeles Times (Mar. 21, 2020), available at <https://www.latimes.com/california/story/2020-03-21/coronavirus-air-pollution-health-risk>; Lisa Friedman, New Research Links Air Pollution to Higher Coronavirus Death Rates, New York Times (Apr. 7, 2020), available at <https://www.nytimes.com/2020/04/07/climate/air-pollution-coronavirus-covid.html>.

⁵ <https://laedc.org/2020/03/01/laedc-ev-industry-report/>



programs, like the U.S. Employment Plan, builds a just economy for Californians while also preventing the worst of our dirty air public health crisis. Our coalition members worked closely on Community Benefit Agreements and unionization efforts at in-state manufacturing facilities for medium- and heavy-duty electric vehicle manufacturers, which provide pathways to middle class lives for communities that are too often left behind. Additionally, Community Benefit Agreements also contain targeted training and hiring provisions for local women, veterans, and other people who have been traditionally excluded from the manufacturing sector, local hire, and disadvantaged hire. Our coalition feels strongly that people living in the same communities as emerging electric vehicle job opportunities can and should be afforded onramps to these good jobs, which benefit the holistic health of the community via less polluting products, lower VMT and pollution from the workforce, and a more sustainable local economy.

CARB's ACT Regulation will also create new opportunities in the electrical industry for small, medium, and large businesses, and support high-quality career paths and state-certified apprenticeship opportunities. Programs like the Electric Vehicle Infrastructure Training Program (EVITP) are already preparing state-certified electricians to construct and maintain the charging infrastructure needed to achieve California's climate goals.

III. The ACT Regulation Strengthens California's Future and Cannot Be Subject to Delay

Though the COVID-19 pandemic has hit certain sectors of the consumer economy especially hard, including international trade and supply chains, in our interconnected world, this is a temporary lull. While experts anticipate a recession and recovery that lasts beyond the timelines of this pandemic, the international supply chain *will* recover and trade volumes *will* increase.

Now is the time to set the zero-emission rules for a fair and transparent playing field in the transportation sector. A temporary downturn or shift in operations does not change the need for long-term environmental equity or the need to support the long-term infrastructure and manufacturing capacity for zero-emissions economy. We also fundamentally reject the notion that zero-emission investments in the trucking industry should fall to the truck drivers least able to invest in emerging technologies. In some sectors of the trucking industry, these drivers are willfully misclassified as independent contractors by their employers, i.e. the companies that fully control access to their work, leaving these truckers most vulnerable to the burden of the transition to electric vehicles. The ACT regulation sets the groundwork for production of electric drayage trucks, and any resulting fleet or truck adoption rules must be structured so that the regulatory burden does not fall on workers and actually improves workers' livelihoods.

Now is the time to implement zero-emissions throughout the transportation sector, starting with the sectors that have faced no slowdown or negative capital impact from the virus, including warehousing and regional distribution, local delivery, and the food supply chain. These operations have demonstrated their essential role in our economy and public health infrastructure during the COVID-19 crisis. As they continue to perform this essential service for the general public, they must use zero-emissions vehicles, TRUs, and equipment to ensure the public health of specific communities where they operate. The transportation sectors that have remained active during the COVID-19 crisis remain well capitalized and have demonstrated their long-term stability, making them well positioned to implement short-term electrification goals. Immediate electrification progress in these essential transportation sectors will then



support near-term electrification of other goods movement sectors as they recover post-pandemic.

We support CARB's efforts to expand the scope of this rule in all vehicle classes and beyond the initial 2030 targets. The proposed regulation will double the number of medium- and heavy-duty trucks on the road in California by 2035 and will better enable us to meet the imperative 2045 carbon. We appreciate CARB's commitment to protecting public health, and ask that the agency to move forward with this strengthened regulation as soon as possible.

Sincerely,

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