



May 28, 2020

Mr. Jack Kitowski, Division Chief
Mr. Paul Arneja, Air Resources Engineer
Mr. Craig Duehring, Manager
Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Business and Health Care Coalition Support for Updated Advanced Clean Truck (ACT) Proposal

Dear Mr. Kitowski, Mr. Duehring, and Mr. Arneja,

On behalf of the California Health Care Climate Alliance and the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network, we write to express our strong support for the strengthened Advanced Clean Truck (ACT) rule. Despite the fact that California met its 2020 greenhouse gas (GHG) emissions reduction target early, transportation emissions continue to rise. Reducing emissions from transportation will be crucial for meeting the state's 40% by 2030 and 80% by 2050 GHG targets. The current ACT proposal will accelerate the cost-effective deployment of electric medium- and heavy-duty vehicles, allow our members to meet financial and climate goals, and significantly reduce air pollution-related health impacts and costs across the state.

The California Health Care Climate Alliance works with a network of 122 leading California hospitals to improve the sustainability of hospital operations and promote the health of patients, employees, and communities. The Ceres BICEP network includes 58 major businesses across the United States, many of whom have substantial operations, or are headquartered, in California. Hospitals and large corporations value resilient and efficient transportation systems that cost effectively reduce air pollution and climate emissions. Decarbonizing the transportation sector helps hospitals and businesses address climate risk, save money and hedge against volatile fossil fuel prices, while cleaner air improves public health and reduces health costs.

The ACT rule is an essential climate and clean air policy. Transportation is responsible for over 50% of California's GHG emissions (including petroleum refineries and oil production emissions).¹ Heavy-duty trucks, which are mostly diesel-fueled, are responsible for 8.4% of total GHG emissions,² are the largest source of smog-forming nitrogen oxides in California, and emit nearly 40% of the state's diesel particulate matter. Diesel particulate matter alone accounts for about 70% of air toxin-related cancer risk. These burdens disproportionately impact the communities that live closest to freight hubs and transportation corridors. The \$8.9 billion in health benefits generated by the proposed rule are particularly important for these frontline communities.³ This is all the more critical during the COVID-19 pandemic, when low-income and communities of color are more vulnerable and analyses have linked poor air quality with a weakened ability to fight off viruses such as COVID-19.⁴



Climate change poses a significant risk to the long-term economic success of our members, impacts the health and livelihood of the communities in which they live and operate, and disrupts the value chains on which they rely. Because of these risks, more than 850 companies globally, including nearly 150 headquartered here in the US, have set comprehensive science-based targets for reducing GHGs.⁵ Health systems have also committed to increasing climate resilience and reducing GHGs.⁶ However, our companies and hospitals cannot fully address the risks or realize the value of tackling climate change without a robust market for clean transportation solutions and strong carbon reduction policies that send clear, long-term economic signals. By driving market transformation, this rule will enable economic growth in a clean, resilient sector, generating almost 2 million new jobs for Californians, and save hundreds of millions if not billions in avoided costs from reduced emissions.⁷

For our members, transportation is both a significant cost center and a major contributor to their carbon footprint—within their own operations as well as in their up and downstream value chains. In the years ahead, zero emission trucks will be critical to our companies and hospitals achieving their financial and sustainability goals, as well as to the long-term economic success of the trucking industry. The ACT rule is a key first step in a suite of policies needed to address some of the primary challenges our members face when considering fleet electrification. These include: (1) limited EV model availability, especially in the medium- and heavy-duty sector; and (2) lack of control over leased, rented and/or up/downstream transportation. This rule will push manufacturers to increase model availability to meet the needs of fleet operators, drive investment in clean transportation research and development, and encourage economies of scale that will help bring down costs.

Our company and health care partners see reducing GHGs and costs from transportation as an economic and public health imperative. This rule will help transform the market, something our members cannot do on our own. We urge you to expeditiously adopt the updated ACT rule. As we grapple with the new circumstances and challenges of the COVID-19 pandemic, this rule will help ensure the long-term health of the state's economy and citizens. Increased access to cost-effective electric trucks will allow our companies and health systems to meet their climate and financial goals, while also giving California communities the significant health benefits of cleaner air.

Thank you for your time and consideration.

Sincerely,

Anne L. Kelly
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The [Ceres BICEP Network](http://www.ceres.org/BICEP) comprises influential companies advocating for stronger climate and clean energy policies at the state and federal level in the U.S. As powerful champions of the accelerated transition to a low-carbon economy, Ceres BICEP Network members have weighed in when it has mattered most. For more information on the Ceres BICEP Network, visit www.ceres.org/BICEP.

The California Health Care Climate Alliance is a coalition of California health systems that are committed to protect the public from the health impacts of climate change, become anchors for resilient communities, and contribute to meeting the state's climate goals. The Alliance was launched in collaboration with Health Care Without Harm. The Alliance members represent the five largest health systems in the state, with a total of 122 hospitals. Please visit the [California Health Care Climate Alliance](#) for more information.

¹ California Air Resources Board. California Greenhouse Gas Emissions for 2000 to 2017. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf

² GreenCar Congress. August 14, 2019. California 2017 GHG inventory shows 1.2% total drop from 2016; transportation sector emissions up 1%. <https://www.greencarcongress.com/2019/08/20190814-calighg.html>

³ California Air Resources Board. "Attachment C Updated Costs and Benefits Analysis for the Proposed Advanced Clean Trucks Regulation." April 2020. <https://ww3.arb.ca.gov/regact/2019/act2019/30dayattc.pdf>

⁴ Harvard University. "COVID-19 PM2.5: A national study on long-term exposure to air pollution and COVID-19 mortality in the United States." April 5, 2020. <https://projects.iq.harvard.edu/covid-pm>

⁵ Science Based Targets Initiative. "Companies Taking Action." May 2020. <https://sciencebasedtargets.org/companies-taking-action/>

⁶ Global Green and Healthy Hospitals. "Health Care Climate Challenge Participants." <https://www.greenhospitals.net/health-care-climate-challenge-participants/>

⁷ Natural Resources Defense Council. "First-Of-Kind Study Shows Electric Trucks Are Triple-Win." December 11, 2019. <https://www.nrdc.org/experts/simon-mui/first-kind-study-shows-electric-trucks-are-triple-win>