



December 6, 2020

VIA E-MAIL

California Air Resources Board (CARB)
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Fiscal Year 2020-2021 Funding Plan for Clean Transportation Incentives

Dear Board Members:

We appreciate the opportunity to provide comments on the FY 2020-2021 Funding Plan, specifically for the **Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP)**.

As Attorney General Xavier Becerra (and now Health and Human Services Secretary-Designate) recently stated, “far too often, modest income and minority communities bear the brunt of environmental pollution and the resulting health risks.” Many of these communities are located in areas with significant commercial truck traffic for last mile deliveries. As CARB itself noted, “long-term exposure to particulate matter and ozone has been linked to an increased risk of cancer and other adverse health outcomes, including the development of asthma, chronic obstructive pulmonary disease, decreased lung function, and nonfatal heart attacks.”¹

As CARB looks to help California meet Governor Gavin Newsom’s ban on sales of new-gasoline powered vehicles, **we encourage the Board to authorize the HVIP trucks to be subleased to multiple operators in a “truck sharing” model.** Production for zero-emission trucks is still in its infancy and traditional truck owners need time to fully embrace the transition away from gasoline and diesel-powered vehicles. According to a 2020, Environmental Defense Fund (EDF) study, “Under the current business-as-usual scenario, fossil-fueled trucks still would account for more than half of the trucks on U.S. roads in 2050.”²

Platforms like FluidTruck.com can help get more zero-emission trucks on the road. Purchasers who list their vehicles are able to take advantage of resource sharing of their investment, while making the vehicle broadly available to a diverse group of small and medium businesses (see Attachment A). To address the HVIP location requirements, Fluid Truck has telematics capabilities that can ensure that the HVIP-funded vehicles are only operated within California.

¹ “Attorney General Becerra and CARB file motion to intervene in lawsuit to protect vulnerable Los Angeles area communities from air pollution.” Global Environment Facility, 4 Nov. 2020, <https://ww2.arb.ca.gov/news/attorney-general-becerra-and-carb-file-motion-intervene-lawsuit-protect-vulnerable-los-angeles>. Press release.

² Mathers, J. “New report shows truck and bus manufacturers are readying for a zero-emission future.” *GreenBiz* 4 Nov. 2020, <https://www.greenbiz.com/article/new-report-shows-truck-and-bus-manufacturers-are-readying-zero-emission-future>

In addition, truck sharing will ensure that small businesses and independent delivery truck drivers have **access** to a wide variety of zero-emissions trucks subsidized by the program, reducing the use of high polluting vehicles for last mile deliveries, improving the air quality for local communities and drivers. There has been a significant rise in the number of Black, Hispanic, and Asian truck drivers³ and trucking entrepreneurs. The truck sharing model provides access to these zero-emission vehicles at a lower cost, enabling diverse entrepreneurs to enter the growing delivery and logistics industry.

The team at Fluid Truck is committed to supporting CARB's current and future transportation innovations. We are available for any follow-up conversations.

Sincerely,

Jenifer Snyder
General Counsel
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³ Rajamanickam, V. "The unsurprising growth of Hispanics within the trucking industry." *Freight Waves* 10 Oct. 2019, <https://www.freightwaves.com/news/the-unsurprising-growth-of-hispanics-within-the-trucking-industry>

Attachment A

Maximizing HVIP Investment

Fluid is a tech-based truck rental marketplace transforming vehicle fleets

Fluid's Mission: To change the way small to mid-sized businesses utilize resources through a sharing economy - eliminating resource hoarding.



CARB Opportunity:

- 1) Accelerate adoption of ZEV fleets:** On-demand fleet of zero-emission trucks; Fluid's platform allows people to seamlessly test and use ZEVs for their business without the capital cost required to purchase.
- 2) Get more ZEVs on to the roads:** With zero-emission truck production output low with long lead-times, owners and recipients of HVIP vouchers can maximize the usage of their truck purchase by offering vehicle during their off-peak hours; eliminates 2.5 diesel trucks for every 1 zero-emission truck



Fluid Enables Affordable Access

Every truck on Fluid eliminates 2.5 trucks off the road by enabling one truck to service multiple users in a day.

