



ZERO EMISSION
TRANSPORTATION
ASSOCIATION

April 7, 2023

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the Advanced Clean Fleets Regulation

Submitted Electronically via: <https://ww2.arb.ca.gov/rulemaking/2022/acf2022>

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of over 60 member companies advocating for 100% electric vehicle (EV) sales. Our membership spans the entire U.S. domestic EV supply chain and includes critical materials, charging companies, battery manufacturers and recyclers, utilities, fleet operators, and auto manufacturers, among others. Notably, many of our members have been active participants in advancing California's decarbonization goals, policies, and clean energy sector. Together, our coalition is dedicated to ensuring that the United States wins the global clean transportation race and that American workers and consumers benefit as the EV industry expands.

Background

The Advanced Clean Fleets (ACF) program was proposed in August 2022 by the California Air Resources Board (CARB) to catalyze the deployment of medium- and heavy-duty zero-emission vehicles (ZEVs). Following October 2022 public hearings, CARB released proposed amendments to the proposed rule in March 2023. One such amendment pertains to section 2016 of the ACF regulation, and would accelerate the 100% ZEV requirements.

ZETA extends its gratitude to CARB for the opportunity to comment on the proposed amendments and offers our members' support for the accelerated timeline in section 2016 as proposed. These requirements are an important step towards decarbonizing the transportation sector's largest polluters. Transitioning to a completely electrified transportation sector will not only reduce emissions, but also help promote American economic competitiveness while creating well-paying domestic jobs. Fleet electrification in particular presents an outstanding opportunity to accelerate ZEV deployment and these revised regulations will send a clear market signal to the entire EV sector to unlock increasing amounts of private investment beyond the vast amounts that have already been committed.¹

¹ <https://www.zeta2030.org/education-fund/investments>

ZEVs are now available in all medium- and heavy-duty classes, with many already presenting favorable total cost of ownership today.² That can be expected to further improve by 2036 and continued innovation and learning by industry will only increase product offerings and vehicle capabilities during the intervening years. We would like incorporate into our comments by reference, a January 2022 ZETA white paper entitled *Medium- and Heavy-Duty Electrification: Weighing the Opportunities and Barriers to Zero Emission Fleets*, which provides a more comprehensive market assessment and discussion of the benefits of electrifying Class 2b through 8 vehicles.³

Emissions Reductions and Associated Health Benefits

The proposed amendments to section 2016 will have a critical impact on the reduction of on-road GHG emissions. Transportation accounts for 27% of all U.S. GHG emissions, and constitutes the largest source of emissions across all economic sectors.⁴ Light-duty vehicles cause the largest, accounting for 57% of transportation GHG emissions. Personal internal-combustion engine vehicle tailpipes emit around 19 pounds of carbon dioxide and other climate pollutants for every gallon of gas burned.⁵

Medium- and heavy-duty vehicles (MHDVs), however, have a disproportionate impact. MHDVs account for 26% of transportation GHG emissions,⁶ despite comprising a much smaller segment of on-road vehicles. Beyond climate pollutants, heavy-duty vehicles alone account for 57% of transportation sector particulate matter pollution despite only representing 10% of vehicles on the road.⁷ Crucially, exposure to these on-road emissions is not distributed equally amongst California communities. A 2019 assessment by the Union of Concerned Scientists found that California residents of color are exposed to more PM2.5 pollution from cars, trucks, and buses, at 21-49% higher rates on average.⁸ Finalizing the proposed amendments to section 2016 would ensure that these communities avoid years of on-road pollution.

By removing the highest-polluting vehicles from the roads, transportation electrification will yield tremendous benefits for California residents by reducing health costs and saving lives. EPA reports that 45 million people in the U.S. live within 300 feet of a major traffic facility or corridor.⁹ Proximity to these roadways exposes residents to needless health risks, and replacing older truck and bus fleets with electrified alternatives has the potential to yield robust public health benefits. In fact, the American Lung Association's *The Road to Clean Air* report shows that, in California alone, full electrification of transportation could avoid over \$22 billion in

² <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/medium-and-heavy>

³ [White Paper: Medium- and Heavy-Duty Electrification - Weighing the Opportunities and Barriers to Zero Emission Fleets](#)

⁴ [Sources of Greenhouse Gas Emissions | US EPA](#).

⁵ [Car Emissions & Global Warming | Union of Concerned Scientists](#)

⁶ [Fast Facts on Transportation Greenhouse Gas Emissions | US EPA](#)

⁷ [Ready for Work](#)

⁸ <https://www.ucsusa.org/sites/default/files/attach/2019/02/cv-air-pollution-CA-web.pdf>

⁹ <https://www.epa.gov/air-research/research-near-roadway-and-other-near-source-air-pollution>

health impact costs in 2050, avoiding 1,924 premature deaths, 26,292 asthma attacks, and 122,047 lost work days.¹⁰

American Jobs and Economy

Accelerating the onset of the 100% ZEV sales requirement will also send critical market signals to American manufacturers that will result in domestic jobs and investment. In 2020, 42,503 Californians were employed by the electric vehicle industry.¹¹ Since then, U.S. industry has been well supported at the federal level by the Biden-Harris Administration through funding provided by the Inflation Reduction Act and the Infrastructure Investments and Jobs Act. Adjusting the 100% ZEV timeline for ACF would provide the regulatory certainty necessary to support continued robust investment in U.S. manufacturing.

Conclusion

ZETA appreciates the opportunity to comment on CARB's proposed amendments to the Advanced Clean Fleets regulation. We encourage CARB to adopt the proposed amendments to section 2016, moving the 100% ZEV sales requirement forward from 2040 to 2036. Our coalition remains firmly committed to rapid mobilization of the U.S. zero emission transportation sector to combat the climate crisis, address public health and pollution, as well as strengthen U.S. economic security and competitiveness. We applaud the state of California and CARB for their work to pioneer our clean transportation future.

Sincerely,



Albert Gore
Executive Director
Zero Emission Transportation Association

¹⁰ <https://docs.house.gov/meetings/GO/GO00/20220405/114593/HHRG-117-GO00-20220405-SD011.pdf>

¹¹ <https://e2.org/wp-content/uploads/2021/08/E2-Clean-Jobs-California-2021.pdf>