



December 9, 2019

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

Subject: Strengthening the Advanced Clean Truck Regulation

Dear Chair Nichols and Members of the Board:

On behalf of the [Los Angeles Cleantech Incubator](#) (LACI), thank you for the opportunity to provide comment on the proposed Advanced Clean Truck (ACT) Regulation.

LACI strongly supports the California Air Resources Board's aim to accelerate the large-scale transition of zero emission medium- and heavy-duty vehicles. This is a critical moment in the development of the industry and the signals that CARB sends to the market via the adoption of the ACT Regulation promise to have a powerful impact on how quickly the transition progresses.

Given the severe air pollution and greenhouse gas impacts of the goods movement sector today and the aggressive goals that the Los Angeles region has established for 2028 and 2035 to transition trucks to zero emissions (outlined below), **we strongly encourage CARB to strengthen the proposed rulemaking by increasing the overall mandates to ensure that by 2030 no less than 15 percent of medium and heavy-duty trucks on the road in California are zero emission.** Doing so will be critical to aiding the Los Angeles region in meeting its goals and leading the way for the state as a whole.

As detailed below, zero emissions technology is rapidly developing. These technology advancements, combined with the strong political will for zero emissions solutions demonstrated by both the public and private sectors, indicate that fulfilling a stronger ACT regulation is not only necessary, but possible.

About LACI and the Transportation Electrification Partnership

LACI is a nonprofit organization that is creating an inclusive green economy by unlocking innovation through working with startups to accelerate the commercialization of clean technologies; transforming markets through partnerships with policymakers, innovators and market leaders; and enhancing communities through workforce development, pilots and other programs.

In Spring 2018, LACI convened the [Transportation Electrification Partnership](#), an unprecedented multi-year partnership among local government, state regulators, utilities, leading industry players, labor unions and startups to accelerate transportation electrification and zero emissions goods movement in the greater Los Angeles region. Together, we have set an aggressive goal to achieve an additional 25 percent reduction in

greenhouse gas and air pollution emissions—beyond existing commitments—in Los Angeles County through transportation electrification by 2028.

A stronger ACT regulation is needed to achieve the LA region’s goals

The Los Angeles region is a gateway for goods entering California and the nation as a whole, with forty percent of all the goods that enter the U.S. traveling through the Ports of Los Angeles and Long Beach. Today, goods movement represents the region’s largest source of air pollution.

Accelerating the deployment of zero emissions goods movement vehicles will be essential to achieving the region’s economic, environmental and public health goals. As such, in the recently released 2.0 version of our [Zero Emissions 2028 Roadmap](#), the Transportation Electrification Partnership has committed to work individually and collectively to ensure that by 2028 all public investments into goods movement, freight vehicles and related infrastructure to support goods movement will advance zero emissions solutions, and ensure that the I-710 is the first zero emissions goods movement corridor in the nation.

Furthermore, the partnership has set the following targets for the deployment of zero emission vehicles in Los Angeles County by 2028:

- 60% of medium-duty delivery trucks are electric
- 40% of heavy-duty drayage and short haul trucks are zero emissions
- 5% of heavy-duty long haul trucks are zero emissions

The drayage and short-haul goal is consistent with the pace needed to achieve the [joint goal](#) held by the Ports of Los Angeles and Long Beach for all on-road drayage trucks serving the Ports to be zero emissions by 2035. As shown by recent research by [UCLA’s Luskin Center for Innovation](#), waiting until the early 2030s to implement zero emissions trucks and the supporting infrastructure would lead to significantly more stranded assets and notably worse air quality and public health outcomes.

The technology is developing rapidly, making it possible to achieve a stronger ACT regulation

In Fall 2018, LACI partnered with CARB, the California Energy Commission (CEC), and the Ports of Los Angeles and Long Beach to issue an [RFI on Zero Emissions Trucks, Infrastructure and Pilot Concepts for Goods Movement](#).

With 39 respondents across startups and incumbents, vehicle manufacturers and infrastructure providers, the RFI demonstrated significant product development in the zero emissions medium- and heavy-duty vehicle segments. In particular, respondents reported that they had achieved/planned the following short-term technology milestones:

Medium-Duty

- 22 battery electric trucks on the road or currently in development; 7 additional planned for 2020-2021
- 6 fuel cell vehicles on the road or currently in development; 4 additional planned for 2020-2021

Heavy-Duty

- 9 battery electric trucks on the road or currently in development; 11 additional planned for 2020-2021
- 7 fuel cell trucks on the road or currently in development; 6 additional planned for 2020-2021

In the year since, we've seen a number of strong indicators that this development is on track, including last week's announcement from Penske Logistics that it has logged [more than 10,000 over-the-road miles](#) with two Freightliner Innovation Fleet eCascadia heavy-duty trucks in Southern California.

For all of these reasons, we strongly encourage CARB **to strengthen the proposed rulemaking by increasing the overall mandates to ensure that by 2030 no less than 15 percent of medium and heavy-duty trucks on the road in California are zero emission.** We believe that a more ambitious standard is achievable and necessary, and LACI stands ready to work with you to transform this critical market.

Thank you for your leadership and the opportunity to provide these comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michelle Kinman". The signature is fluid and cursive, with a long horizontal flourish at the end.

Michelle Kinman
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