



May 26, 2020

Honorable Chair Mary D. Nichols
Honorable Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Business Community Support for Ambitious Advanced Clean Truck Rule

Dear Chair Nichols and California Air Resource Board Members:

As members and supporters of E2 (Environmental Entrepreneurs), we are writing in support of an ambitious Advanced Clean Truck (ACT) rule that ensures *at least* 15% of all trucks on California's roads are zero-emission by 2030 to be consistent with the state's 2045 carbon neutrality goal.¹ A strong ACT rule is essential to meeting our state's air quality and greenhouse gas reduction targets while advancing our clean energy economy.

E2 is a national, nonpartisan group of business leaders, investors, and other professionals from every sector of the economy who advocate for smart policies that are good for the economy and good for the environment. Our members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than \$100 billion in venture and private equity capital.

As business leaders representing a broad range of sectors and industries across the state, we know that mitigating climate change is essential to ensuring a stable and productive Californian economy. And with transportation as our largest-emitting sector, it's clear that we must take meaningful action to decarbonize the state's medium- and heavy-duty vehicles. We support a strong ACT rule as key to that effort and appreciate staff's work to this end, with the updated proposal representing a step in the right direction.

An ACT rule that ensures at least 15 percent of trucks on California roads are zero-emission by 2030 presents an important economic opportunity, as it will drive innovation, investment, and job growth in California's clean energy economy. As highlighted in E2's 2019 Clean Jobs California Report,² our state leads the nation in clean energy jobs, with more than 512,000 Californians working in clean vehicles, renewable energy, energy efficiency, battery storage, and other clean economy industries. California's clean energy economy is a testament to the efficacy of our state's leading climate pollution mitigation policies.

¹ This is consistent with modeling by Lawrence Berkeley National Lab, projections from [Southern California Edison](#), as well as an [independent analysis](#) conducted by a coalition of environmental advocates, labor representatives, community groups, and industry and submitted as public comments during this rulemaking.

² <https://www.e2.org/wp-content/uploads/2019/08/E2-Clean-Jobs-California-2019.pdf>

An ambitious ACT rule will turbocharge California-based zero-emission truck manufacturing for companies throughout the state, including BYD, Dana Electrified, GreenPower, and Tesla. By setting important standards for the world's fifth-largest economy, the ACT rule would send a clear market signal to drive continued zero-emission investment and innovation by these truck manufacturers and expand California's growing clean truck sector. The ACT rule will also position our economy to benefit from growing zero-emission vehicle demand outside of California. In 2018, [electric vehicles were the state's 8th most valuable export, worth almost \\$3 billion in revenue](#),³ and those exports are poised to grow. The stronger the ACT zero-emission sales targets, the greater the boost to California's clean energy economy.

A robust zero-emission truck market will drive additional economic development in California. The electric charging infrastructure needed to support wide-scale zero-emission truck deployment will drive high-skilled job growth and investment in California's burgeoning electric charging infrastructure industry. Electric trucks are also less expensive to service, maintain, and fuel over the lifetime of the vehicle, providing significant long-term cost savings to California businesses and fleet managers. And a transition to domestically produced, increasingly clean electricity would insulate fleets from the volatile global oil market. Furthermore, a transition away from fossil fuel vehicles will reduce local, toxic air pollution and drive important public health benefits. Under the California Air Resources Board's (CARB) updated proposal and analysis, the ACT rule would save California's trucking industry [\\$5.9 billion, mostly due to fuel cost savings, and add \\$8.9 billion](#) in statewide health benefits through 2040.⁴

As the world's fifth-largest economy, California has the market share and expertise to rapidly accelerate this transition, galvanize manufacturers to develop supply chains and build economies of scale to make zero-emission trucks readily available and even more affordable for fleet operators. As with other California policies, the ACT rule represents an opportunity to establish a truck standard that will be replicated across the country, further cementing the state's leadership in the race towards the low-carbon economy of the future.

In addition to ensuring at least 15 percent of trucks on California's roads are zero-emission by 2030, we encourage CARB to do the following:

- Pass a Board resolution that articulates a clear vision for when each truck segments should be 100% zero-emission and explain how those targets are consistent with the state's climate and clean air objectives.
- Ensure the complementary fleet purchase requirement begins before or at the same time as the ACT rule in 2024.

³ <https://www.forbes.com/sites/energyinnovation/2019/09/23/california-electric-vehicle-exports-already-valued-at-3-billion-in-2018-expected-to-hit-35-billion-in-2019/#2c61d7684e27>

⁴ <https://ww3.arb.ca.gov/regact/2019/act2019/30dayattc.pdf>

- Strengthen the ACT rule’s reporting by lowering the requirement threshold to fleets of 25 or more vehicles to inform future programs and improve compliance in difficult market segments, such as port drayage.

The ACT rule is an unprecedented opportunity for California to send a clear market signal that will positively transform the transportation industry and ensure our state meets its climate and clean air goals. By strengthening the ACT rule, CARB can maximize the benefits to California’s economy and cut emissions from medium- and heavy-duty vehicles at the scale needed.

Finally, timely implementation of a strong ACT rule is all the more critical in the face of the ongoing COVID-19 pandemic and the economic contraction it has precipitated. In this challenging time, there is a renewed urgency for essential regulations to ensure we emerge from this crisis a more resilient society that drives job growth by addressing the climate crisis. A strong ACT rule—coupled with existing CARB regulations and rulemakings—will ensure the state captures longer-term job growth and investment, while positioning California’s clean energy industries to drive the state’s economic recovery.

As business leaders who are creating jobs and driving economic growth in California, we thank the CARB Board and staff for their hard work in developing this first-of-its-kind rule. We look forward to continuing to engage in the state’s efforts to decarbonize our transportation sector and develop the clean truck market. For additional information, please contact Zach Amittay at zamittay@e2.org.

Sincerely,

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