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May 28, 2020

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814
RE: Advanced Clean Trucks standard

Dear Chair Nichols and Board Members,

As members of California's Congressional delegation and proud supporters of our state's leadership on clean vehicles, we are writing in support of strong action on zero-emission trucks in the Advanced Clean Trucks (ACT) Regulation. We appreciate your hard work over the past three years on this important standard, which would establish the first sales policy for zero-emission trucks in both the country and the world. As you finalize the ACT rule, we urge you to adopt the strongest possible standard to help reduce local air pollution and heat-trapping emissions.

This standard is modeled after the state's successful Zero Emission Vehicle (ZEV) Program, requiring carmakers make electric passenger vehicles available for California consumers. By setting targets for manufacturers to produce and sell light-duty, zero-emission vehicles, California kickstarted the electric car revolution. Today, zero-emission vehicles are one of California's largest exports.[1]

The transportation sector is the largest emitter of global warming pollution in both California and the United States. Trucks and other heavy-duty vehicles are disproportionately polluting: they make up only 7 percent of vehicles in California, yet are responsible for 20 percent of global warming emissions, 40 percent of NO_x emissions, and 27 percent of $PM_{2.5}$ emissions from the transportation sector.[2] Global warming emissions from heavy-duty vehicles in California have shown no decline over the last 6 years.[3] Nearly every Californian lives in counties with unhealthy levels of ozone and particulate matter.[4] In the Los Angeles region (South Coast Air

[1] 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/#1ca61e954e27
[2] Chandler, S., J. Espino, and J. O'Dea. 2016. Delivering opportunity: How electric buses and trucks can create jobs and improve public health in California. Cambridge, MA: Union of Concerned Scientists. www.jstor.org/stable/resrep17234
[3] California Air Resources Board. 2019. California Greenhouse Gas Inventory for 2000-2017. ww3.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scoping-plan_sum_2000-17.pdf (b) U.S. Environmental Protection Agency. 2019. Sources of Greenhouse Gas Emissions. https://www.epa.gov/ghgemissions/sources-green-house-gas-emissions
[4] American Lung Association. 2020. State of the Air. Washington, DC. Online at www.stateoftheair.org/

Basin), ozone levels have exceeded the 2015 National 8-hour standard (0.070 ppm) for more than 120 days each of the last four years.[5]

In order to improve local air quality and reduce California's contribution to global warming, we request that you establish the strongest possible zero-emission truck sales targets. We are aware that in December 2019, dozens of environmental, labor, health, and community organizations made public comments calling for stronger sales targets that would result in at least 15 percent of trucks on the road being zero-emission by 2030.[6] We are also aware of the recent Lawrence Berkeley National Lab study that found 20 percent of trucks on the road must be zero-emission by 2030 to reach the state's 2045 climate neutrality goal.[7] Given these considerations, we applaud the Board's direction to staff to strengthen the rule and believe the final proposal is a significant step towards achieving health and climate goals.

The final draft proposal will double the number of electric trucks the original proposal would have achieved through 2035.[8] We are encouraged by the assessment that the new proposal will also result in net statewide savings of $6 billion from 2020-2040 due to reduced fuel and maintenance costs, after accounting for vehicle and charging infrastructure costs. Another $9 billion in savings are expected due to the expected health benefits of the final proposal.[9]

We also support the Board in setting long-term targets for transitioning heavy-duty vehicles in the state to zero-emission technologies. Such targets will be critical to guide additional policies that ensure the heavy-duty vehicle sector transitions from one fueled by diesel to one powered by electricity and hydrogen.

Since public workshops for the ACT rule first began in 2016, numerous companies and manufacturers have taken steps towards truck electrification. As of November 2019, there were 27 different manufacturers with 70 different models of zero-emission trucks and buses available today or within the next two years. Battery and fuel cell electric offerings span Class 2b to Class 8 trucks and buses and include vehicles from new entrants such as Proterra, Tesla, BYD, and Rivian to established original equipment manufacturers (OEMs) such as Daimler, Volvo, and Navistar.

Many electric trucks are on the road or on order. As of October 2019, California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project has awarded vouchers for the purchase of 2,700 zero-emission trucks and buses across vehicle categories.[10] However, a strong standard is needed to take the electric truck market from one of pilot projects and press releases to one that can support a widescale shift from combustion technologies to electric technologies.

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[5] https://www.arb.ca.gov/aqmis2/ozone_annual.php

[6] Advanced Clean Trucks coalition. 2019. ACT Coalition Comments on Proposed ACT Rule. Online at www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=act2019&comment_num=46&virt_num=46

[7] McCall, M. and A. Phadke. 2019. Clean trucks standards consistent with carbon neutrality are economically and environmentally compelling. Berkeley, CA: Lawrence Berkeley National Laboratory. Online at www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=act2019&comment_num=108&virt_num=97

[8] O'Dea, J. 2020. The Biggest Step To-Date on Electric Trucks. The Equation. Cambridge, MA: Union of Concerned Scientists. Blog, April 29. Online at https://blog.ucsusa.org/jimmy-odea/the-biggest-step-to-date-on-electric-trucks.

[9] California Air Resources Board. 2020. Updated Costs and Benefits Analysis for the Proposed Advanced Clean Trucks Regulation. Sacramento, CA. Online at ww3.arb.ca.gov/regact/2019/act2019/30dayattc.pdf.

[10] O'Dea, J. 2019. Ready for Work: Now Is the Time for Heavy-Duty Electric Vehicles. Cambridge, MA: Union of Concerned Scientists. https://www.ucsusa.org/sites/default/files/2019-12/ReadyforWorkFullReport.pdf.

Infrastructure investments and policies are underway to support the transition to electric trucks. The California Public Utilities Commission approved investments in heavy-duty electric charging infrastructure for all three major private electric utilities in the state, supporting at least 18,000 heavy-duty electric vehicles and equipment by 2025. Electricians are ready to build the infrastructure to support electric trucks *today* and statewide training initiatives continue to prepare electricians for the shift to clean transportation technologies.

Strengthening the sales standard for manufacturers is critical for California to act on climate and meet air quality standards, especially in communities disproportionately impacted by air pollution. The health, economic, and environmental benefits from a stronger standard are undeniable and long overdue. California has often been a national leader for strong climate and clean car standards, and by setting a strong standard for electric trucks, our state will set a precedent for many others to follow. Thank you for your consideration.

Sincerely,

Nanette Diaz Barragán
Member of Congress

/s/ Jared Huffman
Member of Congress

/s/ Alan Lowenthal
Member of Congress

/s/ Jackie Speier
Member of Congress

/s/ Julia Brownley
Member of Congress

/s/ Anna G. Eshoo
Member of Congress

/s/ Jimmy Gomez
Member of Congress

/s/ Mark DeSaulnier
Member of Congress