



360 14TH STREET, 2ND FLOOR  
OAKLAND, CA 94612  
GREENLINING.ORG

December 06, 2019

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

**RE: Support for a stronger Advanced Clean Trucks rule**

Dear Chair Mary Nichols and Members of the California Air Resources Board and staff,

On behalf of the Greenlining Institute, I would like to express our request for a significant strengthening of the Advanced Clean Truck (ACT) rule proposal.<sup>1</sup>

Founded in 1993 as an answer to redlining, the Greenlining Institute advances economic opportunity and empowerment for people of color through advocacy, research and leadership development. Since 2011, Greenlining has been on the cutting-edge of research and advocacy efforts to ensure low-income people of color benefit from and have access to electric cars, trucks and buses. Our support for a stronger ACT rule aligns with our commitment to ensure race and class are not factors to adverse toxic air quality and that the benefits of electrifying California's truck fleet are felt by those most harmed by current emissions.

After thorough review of the current proposal and a broad consideration of various organizations' concerns, we have determined that stronger regulations are not only necessary and feasible but just. As it stands, the proposal would result in zero-emission trucks comprising 4 percent of California's trucks by 2030; this is an insufficient standard and will fail to address the imminent severe climate and public health consequences our state is facing.

**The Greenlining Institute urges CARB staff to strengthen the ACT standard through the following changes:**

**(1) Increasing the overall sales mandates to ensure that by 2030 no less than 15 percent of medium- and heavy-duty trucks on the road are zero-emitting.**

---

<sup>1</sup> "Advanced Clean Trucks Regulation | California Air Resources Board." *Ca.Gov*, 12 Dec. 2019, [ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks](http://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks). Accessed 6 Dec. 2019.

According to a study by the Union of Concerned Scientists,<sup>2</sup> African American and Latino Californians face 43 percent and 39 percent higher PM2.5 pollution than white Californians, respectively. These communities tend to be located where toxic air concentrates, such as ports and highways saturated by truck operations and their diesel emissions. If current levels of exposure continue to persist, low-income communities of color will bear grave health consequences from air pollution such as asthma, heart and lung diseases, cancer and premature death.

The current ACT rule proposal only aims to ensure 75,000 (4%) of California's trucks be zero-emission by 2030. By increasing the mandate to ensure no less than 15% of trucks are zero-emission by 2030, the Air Resources Board signals to manufacturers to increase supply and catalyze the medium- and heavy-duty electrification process. Given that communities of color face greater air pollution impacts than their white counterparts, a stronger signaling would address inequitable air quality consequences quicker.

### **(2) Including Class 2b pickup trucks in the mandates beginning in 2024.**

Under the current proposal, class 2b pickup truck manufacturers are not required to produce zero-emission trucks until 2027. Class 2b pickup trucks make up a significant segment of vehicles on the road and they should be one of the most urgent vehicles to transition during this process. CARB must reinforce more progress not less. By not including this class of vehicle in the rule from the get go we are continuing to harm public health, and leaving low-income communities of color in worse shape.

### **(3) Outlining CARB's longer-term objectives for achieving 100 percent zero-emission trucks in various categories, and explaining how this phase of the rule is consistent with those objectives in attaining federal and state air quality and greenhouse gas objectives.**

CARB should specifically state target dates by when they expect to see 100% of trucks be zero-emission in the ACT rule. The rule should also set explicit dates by when all classes of truck sales must be zero-emissions. Clear language regarding how these goals will comply with pollution and GHG reduction requirements should be included for the protection of communities that are most harmed. Local governments such as the City of Los Angeles have already set an example by committing to ensure 100 percent of their medium-duty trash and recycling trucks be zero-emission by 2028 and intend to reduce port emissions by 80 percent by 2050.<sup>3</sup>

Most recently, the Los Angeles Cleantech Incubator's (LACI) Transportation Electrification Partnership announced their unprecedented commitment to accelerate transportation electrification and zero-emissions goods movement in the Los Angeles region in advance of the 2028 Olympic and Paralympic Games. The Partnership's leadership group already includes CARB along with Mayor Eric Garcetti's office, LA County, LADWP, LA Metro and Southern California Edison. The Partnership's three-pronged approach strives to ensure that "by 2028 all public investments into goods movement,

---

<sup>2</sup> "Inequitable Exposure to Air Pollution from Vehicles in California (2019)." *Union of Concerned Scientists*, 2019, [www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019](http://www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019). Accessed 30 Oct. 2019.

<sup>3</sup> "PLAn | L.A.'s Green New Deal | Sustainability PLAn 2019." [PLAn, 2019, plan.lamayor.org/](http://PLAn.2019.plan.lamayor.org/). Accessed 24 Oct. 2019.

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.”<sup>4</sup>

Similarly, the West Oakland Community Action Plan in partnership with the Bay Area Air Quality Management District have proposed transitioning to zero-emission drayage truck operations by 2035 and depend on a stricter ACT rule to realize that goal.<sup>5</sup>

Private corporations such as Frito Lay<sup>6</sup>, UPS<sup>7</sup> and FedEx<sup>8</sup> have all also committed to incorporating electric trucks to their fleets and Amazon has ordered 100,000 electric delivery trucks to be deployed by 2030.<sup>9</sup> Strong regulations and clear target dates from CARB will set necessary precedents for market investment to accelerate electrification in California. With minimal regulatory standards, CARB will delay momentum in the zero-emission medium- and heavy-duty transition and goods movement market while allowing continued harm in disenfranchised communities.

#### **(4) Committing to adopt corresponding fleet purchase requirements in 2021.**

Finally, CARB has indicated that it will not propose a fleet rule for consideration until 2022 however, we recommend that staff accelerate this proposal in order to adopt it by July 2021 and place it in effect by January 2024. In order to achieve an equitable California where race and class are no longer variables in determining quality of life, the ACT rule must be strengthened, not only for the future of electrification and a zero-emissions California but for the future of our most harmed and polluted communities.

Thank you for your consideration.

Sincerely,

Leslie Aguayo  
Environmental Equity Program Manager

---

<sup>4</sup> “Roadmap - LACI.” *LACI*, 2019, [lincubator.org/roadmap/](http://lincubator.org/roadmap/). Accessed 6 Dec. 2019.

<sup>5</sup> “West Oakland Community Action Plan.” *Baaqmd.Gov*, 2019, [www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan](http://www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan). Accessed 6 Dec. 2019.

<sup>6</sup> FritoLay, Sustainability. *Fritolay.Com*, 2019, [www.fritolay.com/about-frito-lay/sustainability](http://www.fritolay.com/about-frito-lay/sustainability).

<sup>7</sup> “Inside UPS’s Electric Vehicle Strategy | UPS - Estados Unidos.” *Ups.Com*, 2018, [www.ups.com/us/es/services/knowledge-center/article.page?kid=ac91f520](http://www.ups.com/us/es/services/knowledge-center/article.page?kid=ac91f520). Accessed 6 Dec. 2019.

<sup>8</sup> “FedEx Acquires 1,000 Chanje Electric Vehicles.” *About FedEx, 2018*, [about.van.fedex.com/newsroom/fedex-acquires-1000-chanje-electric-vehicles/](http://about.van.fedex.com/newsroom/fedex-acquires-1000-chanje-electric-vehicles/). Accessed 6 Dec. 2019.

<sup>9</sup> “Amazon Co-Founds The Climate Pledge, Setting Goal to Meet the Paris Agreement 10 Years Early | Amazon.Com, Inc. - Press Room.” *Amazon.Com, Inc. - Press Room, 2019*, [press.aboutamazon.com/news-releases/news-release-details/amazon-co-founds-climate-pledge-setting-goal-meet-paris](http://press.aboutamazon.com/news-releases/news-release-details/amazon-co-founds-climate-pledge-setting-goal-meet-paris).