To the Members of the California Air Resources Board,

As major businesses, healthcare systems, and employers in California, we write to express our strong support for an ambitious Advanced Clean Truck (ACT) regulation. We commend the Air Resources Board for developing the first electric truck rule in the nation. This Rule will be a model for the country to follow and will be essential for accelerating the cost-effective deployment of electric medium- and heavy-duty vehicles. Despite the fact that California met its 2020 greenhouse gas (GHG) emissions reduction target early, transportation emissions continue to rise. Reducing emissions from transportation will be crucial for meeting the state’s 40% by 2030 and 80% by 2050 GHG targets. As such, we urge you to increase the vehicle sales requirements such that the Rule results in 15% of all trucks on the road in California are zero emission vehicles by 2030.

The ACT rule is an essential climate and clean air policy. Transportation is responsible for over 50% of California’s GHG emissions (including petroleum refineries and oil production emissions).¹ Heavy-duty trucks, which are mostly diesel-fueled, are responsible for 8.4% of total GHG emissions,² are the largest source of smog-forming oxides of nitrogen (NOx) in California, and emit nearly 40% of the state’s diesel particulate matter. Diesel particulate matter alone is responsible for about 70% of air toxin-related cancer risk. These burdens disproportionately impact the communities that live closest to freight hubs and transportation corridors. By accelerating electrification of trucks, the ACT rule will reduce the transportation sector’s considerable climate and public health impacts--within California and beyond.

Climate change poses a significant risk to our long-term economic success, impacts the health and livelihood of the communities in which we live and operate, and disrupts the value chains on which we rely. Because of these risks, we have set targets to reduce our own GHG emissions. Nearly half of all Fortune 500 companies have set targets to reduce emissions and/or invest in clean technologies.³ Health systems have also committed to increasing climate resilience and reducing GHGs.⁴ However, we cannot fully address the risks or realize the value of tackling climate change without a robust market for clean transportation solutions and strong carbon reduction policies that send clear, long-term economic signals.

For major companies and institutions, transportation is both a significant cost center and a major contributor to our carbon footprint--within our own operations as well as in our up and downstream value chains. In the years ahead, zero emission trucks will be critical to the sustainability of our businesses as well as to the trucking industry. As a technology-forcing program, the ACT rule will address some of the primary challenges we face when considering fleet electrification, including: (1) limited EV model availability, especially in the medium- and heavy-duty sector; and (2) lack of control

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³ Ceres. April 15, 2017. Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change. https://www.ceres.org/resources/reports/power-forward-3
over leased, rented and/or up/downstream transportation. This rule will push manufacturers to increase model availability to meet the needs of fleets and encourage economies of scale that will help bring down costs. We see reducing GHGs and costs from transportation as an economic and public health imperative. However, we often have limited ability to: (1) access electric options when buying or leasing fleet vehicles; or (2) encourage our value chain to take advantage of fleet electrification. This rule will help transform the market, something we cannot do on our own.

While the current proposed rule is a step in the right direction, we have a vanishing window in which to avoid the worst impacts of climate change. Given the current climate imperative and the growing demand from businesses for more EV model availability, we strongly encourage you to set more ambitious targets than currently proposed. Specifically, increase the annual and final percentage sales goals such that 15% of trucks on the road in California will be zero emission by 2030. In the current proposal, the sales goals are not sufficiently high enough to shift the sector at the pace and scale needed to meet the climate challenge.

There are significant economic, public health, and GHG reduction benefits from a more ambitious ACT Rule. A stronger Rule is feasible and could be met largely through sales of electric trucks that are currently or will soon be cheaper than non-electric alternatives. Automakers are already working to fill gaps in the medium/heavy-duty market to meet diverse fleet needs. Multiple cost of ownership analyses, including CARB’s, have found that a variety of electric trucks are already creating cost savings or would be by the time the Rule goes into effect in 2024. Ambitious sales requirements for these vehicles will feed commercial demand and improve the business case for electric trucks, allowing automakers and companies to capture savings from economies of scale.

We urge you to strengthen the Rule to result in 15% of trucks on the road in California being zero emission by 2030. Increasing the ambition of the ACT will send a clear market signal across value chains. This Rule will allow companies and institutions like us to plan for long-term investments in clean vehicles. Increased access to cost-effective electric trucks will allow us to meet our climate and financial goals while giving our communities the significant health benefits of cleaner air.

Thank you for your time and consideration.

Sincerely,

Ben & Jerry’s
California Health Care Climate Alliance
Dignity Health
Nature’s Path
Seventh Generation

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