



Good for the Economy.
Good for the Environment.



CALIFORNIA BUSINESS ALLIANCE
FOR A CLEAN ECONOMY

AMPLIFY

FLEET CHARGING SIMPLIFIED

ARRIVAL

CalEVC

California Electric Transportation Coalition



Ceres

Sustainability is the bottom line.



CHAMBERS FOR
INNOVATION &
CLEAN ENERGY

CURRENT EV
YOUR ELECTRIC VEHICLE & HYBRID EXPERTS
CURRENTEV.COM

flo

innova ev



LABC
Los Angeles
Business Council



LIGHTNING
eMOTORS



LORDSTOWN

lyft

NUMI
ACTIVATING PURPOSE



Palo Alto
Chamber of
Commerce

POWERHOUSE



PROTERRA



SRECTrade



SUSTAINABLE
SILICON VALLEY



TransPower



TRITIUM

VE

VELOCE

March 5, 2021

Liane Randolph, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Advanced Clean Fleets Rulemaking

Dear Chair Randolph & Members of the Board,

We are 24 companies, incubators, investment firms, and business groups investing in the shift to a zero-emission transportation system and a prosperous low-carbon economy. As business stakeholders operating in California and representing trillions of dollars in annual economic activity, we write to express our support for the development of a strong and effective Advanced Clean Fleets (ACF) standard by the California Air Resources Board (CARB).

A strong ACF standard will stimulate important economic development in California, drive innovation and job growth, and create the market structures to advance the state's standing as a manufacturing and business nexus in the global transition to electric vehicles (EVs) and a clean energy economy. An ambitious ACF standard will transition California's medium- and heavy-duty vehicles to zero-emission technologies by 2045 and transition the state's drayage fleet to zero-emission by 2035, as well as help to meet our state's broader air quality and climate goals. In short, the ACF standard holds enormous promise to substantially reduce the transportation sector's greenhouse gas emissions and toxic air pollution that disproportionately harms frontline communities while ensuring California capitalizes on the clean energy economy of the future.

California has already established itself as an epicenter of the clean energy economy, with nearly 540,000 clean energy workers.¹ That figure includes almost 40,000 clean vehicle jobs, which covers jobs in electric and hybrid vehicle manufacturing, repair and maintenance, wholesale trade, and professional service in California's core EV industries. Notably, this does not capture jobs associated with EV charging infrastructure, which is a large and growing industry. With an ambitious ACF standard, CARB will position California's economy to benefit from the enormous growth in zero-emission vehicle (ZEV) demand, both inside and outside of the state. California's ZEV policy leadership over the last decade has provided tremendous benefits to-date, facilitating the rise of a robust and growing ZEV business ecosystem. In 2019, electric vehicles (EV) were the state's 2nd most valuable export, producing over \$7.1 billion in revenue² and growing an impressive 139% year-over-year. Furthermore, this growth has supported high quality jobs; the average wage in California's EV ecosystem is 33% higher than the state's average wage.³ With state and national governments around the world advancing ZEV standards, the global market is only poised to grow; a strong ACF standard will help ensure California's economy and workers are the beneficiary of that growth.

As CARB works to develop this standard, we ask that the Board and staff prioritize the following objectives and include several proposed concepts:

- As a baseline, the standard should go beyond the targets established in the Advanced Clean Trucks (ACT) rule. This will ensure that there is sufficient demand from fleet operators to meet

¹ <https://e2.org/reports/clean-jobs-california-2020/>

² <https://www.census.gov/foreign-trade/statistics/state/data/ca.html>

³ <https://laedc.org/2020/03/01/laedc-ev-industry-report/>

the growing supply of zero-emission medium- and heavy-duty vehicles from manufacturers driven by the ACT rule.

- The standard should enable Executive Order N-79-20, which committed the state to transitioning all drayage trucks to zero-emission by 2035 and all trucks to zero-emissions by 2045.⁴ The standard should also adhere to the Board Resolution in June 2020 to transition last mile delivery and government fleets to 100 percent zero-emission by 2035, and refuse trucks, local buses, and utility fleets to zero-emission by 2040.⁵
- We strongly support CARB’s proposed concept to require the retirement of fossil fuel drayage trucks that have reached the end of their “useful life,” defined as 800,000 miles or 18 years (whichever comes first) by SB 1, and should be expanded to include all fossil fuel medium- and heavy-duty vehicles.
- We also strongly support requiring all trucks entering drayage starting in 2023 be zero-emission.
- The standard and complementary policies or programs should prioritize investments and deployments benefiting frontline communities exposed to disproportionate levels of harmful criteria pollution from trucks via ports and freeways. This is not just equitable, but economically advantageous; climate investments located in California’s disadvantaged communities have supported more jobs per million dollars than investments located elsewhere.⁶
- The standard and complementary policies or programs must support and ensure the development of high-quality jobs in ZEV manufacturing, charging infrastructure, fleet operations, and other related industries and economies.

As leaders in California’s business community creating jobs and driving economic growth in the state, we are grateful to CARB for the role it continues to play in achieving a full transition to zero-emission vehicles in the state as soon as possible. We look forward to working together to effectuate a strong and effective ACF rule as a critical step in that transition.

Sincerely,

Andy Wunder
Western States Advocate
E2 (Environmental Entrepreneurs)

Eileen Tutt
Executive Director
California Electric Transportation Coalition

Heidi Sickler
Director of Policy
Amplify Power

Jennifer Helfrich
Senior Manager, State Policy West
Ceres

Suzanne Merkelson
Public Policy & Government Affairs
Arrival

Diane Doucette
Co-Founder
Chambers for Innovation & Clean Energy

Ruben Aronin
Director
California Business Alliance for a Clean Economy

David Eagle
Founder & CEO
CURRENT EV

⁴ <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf>

⁵ <https://ww3.arb.ca.gov/regact/2019/act2019/finalres20-19.pdf>

⁶ https://innovation.luskin.ucla.edu/wp-content/uploads/2019/03/Employment_Benefits_from_CA_Climate_Investments_and_Co-investments.pdf

Cory Bullis
Senior Public Affairs Specialist, US
FLO

Roman Kuropas
CEO
Innova EV

Emma Giloth
Director of Innovation and Impact
Kuli Kuli

Mary Leslie
President
Los Angeles Business Council

Kash Sethi
Chief Revenue Officer
Lightning eMotors

Matthew DeWine
Government Affairs Representative
Lordstown Motors Corporation

Sam Arons
Director of Sustainability
Lyft

Jane Franch
Director of Strategic Sourcing & Sustainability
Numi Organic Tea

Judith Kleinberg
President
Palo Alto Chamber of Commerce

Emily Kirsch
Founder & CEO
Powerhouse

Jarrett Stoltzfus
Director of Govt. Relations & Public Policy
Proterra

Mike Saxton
Managing Director
SRECTrade

Jennifer Thompson
Executive Director
Sustainable Silicon Valley

Stephanie Ly
Senior Manager, Policy & Sustainability
TransPower

Michael J. Calise, Jr.
President
Tritium

Bonnie Datta
Advisor, Policy & Market Development
Veloce Energy

cc:

Jared Blumenfeld, Secretary, Environmental Protection Agency

Richard Corey, Executive Officer, California Air Resources Board

Edie Chang, Deputy Executive Officer, California Air Resources Board

Heather Arias, Division Chief, Transportation and Toxics Division, California Air Resources Board

Sydney Vergis, Division Chief, Mobile Sources Control Division, California Air Resources Board