



Good for the Economy.  
Good for the Environment.

July 28, 2021

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

**RE: Advanced Clean Fleets Rulemaking - Business Support for 100% ZEV Sales by 2035**

Dear Chair Randolph & Members of the Board,

On behalf of E2 (Environmental Entrepreneurs) and our more than 11,000 members and supporters nationwide – including over 2,500 in California – I write in strong support of an ambitious Advanced Clean Fleet (ACF) rule and urge the California Air Resources Board (CARB) to ensure all new medium and heavy-duty vehicle sales are zero-emission by 2035. A 100% zero-emission vehicle (ZEV) sales requirement for all truck classes by 2035 will drive strong investment and job creation in California's clean energy economy, solidify our state's zero-emission truck and bus manufacturers' and charging infrastructure companies' global leadership position, and enable California businesses to quickly and fully capture operating cost savings from zero-emission trucks and busses. Additionally, this goal will help California achieve Governor Newsom's Executive Order N-79-20 as well as the targets set in CARB's California's Mobile Source Strategy

E2 is a national, nonpartisan group of business leaders, investors, and 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.

A 100% ZEV sales mandate for all truck classes by 2035 builds on the success of the Advanced Clean Trucks (ACT) rule and is a necessary component of the forthcoming ACF rule. California's global leadership on transportation electrification and the development of a robust clean energy economy is the product of bold and ambitious policies. California's system of technology forcing regulations backed by strategic incentives and supportive policies has helped nurture, grow and scale the state's ZEV industry into a global force.

Innovative clean energy policies continue to pay dividends for California's economy. In 2020, electric vehicles were the state's most valuable export, [producing over \\$5.6 billion in revenue](#) and overtaking California's aerospace industry for the first time. A 100% zero-emission truck sales requirement by 2035 will position California's economy to continue reaping the benefits of the growing ZEV industry. As an established center of the clean energy economy, there is a strong base of nearly [485,000 clean energy workers](#) with 42,000 specifically employed in clean vehicle jobs. Notably, these clean vehicles jobs do not capture employment within the burgeoning EV charging infrastructure industry, which is a potent job creator. The average wage in California's EV ecosystem is [33% higher than the state's average wage](#), which speaks to the success and quality of jobs in this space.

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The lower fuel and maintenance costs enjoyed by zero-emission trucks and busses can add up quickly for fleets; Class 2b-8 medium- and heavy-duty ZEVs benefit from an average \$0.20/mile lower TCO than traditional internal combustion technology. These savings can be reinvested in the state's economy and stimulate additional consumer spending. A 100% ZEV sales target for all new medium- and heavy-duty vehicles by 2035 will provide clarity and certainty for manufacturers, utilities, and fleets allowing them to make strategic business investments today.

ZEV technology is evolving rapidly, with substantial progress occurring in the last year. Sending a clear policy signal that aligns with the dynamism of the ZEV industry and with the state's zero-emission targets is necessary and attainable. Furthermore, it is critical to meeting state goals set by Governor Newsom and CARB's mobile source strategy. California must remain at the forefront by pursuing ambitious policies to fully unlock the potential growth of a robust ZEV industry and decarbonize the transportation sector. For these reasons, we urge CARB to adopt a 100% ZEV sales requirement for all truck classes by 2035 through the ACF rule currently under consideration.

Thank you for your continued leadership on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Philly Andy Wunder" followed by a stylized flourish.

Andy Wunder  
E2 Western States Advocate