

**Comment 1 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation:

Subject: Speciality Vehicles and the ACF Rule

Comment:

Please find attached multi-stakeholder comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-acf-comments-ws-AWJcNIUxAzFSOgZZ.pdf>

Original File Name: Clean Fleets Comments Utility Coalition - final complete.pdf

Date and Time Comment Was Submitted: 2021-02-04 17:38:39

No Duplicates.

**Comment 2 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Henry

Last Name: Rodgers

Email Address: info@harborassn.com

Affiliation: Harbor Association of Industry and Commerce

Subject: RE: Drayage Truck Rule

Comment:

Attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-acf-comments-ws-BWFFVIVExUXsHYFI1.pdf>

Original File Name: Drayage Working Group\_HAIC.pdf

Date and Time Comment Was Submitted: 2021-02-08 07:32:22

No Duplicates.

### **Comment 3 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Steve

Last Name: Moore

Email Address: stevemore@pandrtrucking.com

Affiliation:

Subject: Zero Emission Trucks May Not Be Zero Emission

Comment:

Please address the entire life cycle of Zero emission trucks.

1) How will the energy produced to power all these trucks and cars affect the environment? Solar and wind can only go so far.

Zero emission trucks are not zero emission if the source energy and distribution system is not zero emission as well.

Where will the massive increase in electrical power come from and at what environmental and economic cost?

3) How will we recycle all of these "hazardous materials" at the end of the equipment life. What is the environmental and economic costs to reclaim these vehicles including the batteries?

Today nearly 95% of vehicles are easily recycled. Battery driven vehicle recycling challenges need to be addressed.

Zero emission is not zero emission if these two issues won't allow for it.

Near zero emission with natural gas may be a better net value when all sources are included in the analysis.

Please address the important considerations above.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-02-08 10:51:33

No Duplicates.

**Comment 4 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tom

Last Name: Becker

Email Address: tsbecker069@gmail.com

Affiliation:

Subject: Clean Fleet Rulemaking Comments

Comment:

See attached PDF.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-acf-comments-ws-BmUGbAFIVmQHb1MM.pdf>

Original File Name: Clean Fleet Rulemaking Comments.pdf

Date and Time Comment Was Submitted: 2021-02-17 13:07:44

No Duplicates.

**Comment 5 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: American Lung Association in re: zero emission drayage

Comment:

Please see attached comment on Advanced Clean Fleet rule proposals related to drayage.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-acf-comments-ws-WjZWJVI9UGQLUgRl.pdf>

Original File Name: Lung Assn ED letter in re ACF 2.22.21.pdf

Date and Time Comment Was Submitted: 2021-02-22 11:31:04

No Duplicates.

**Comment 6 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Josh

Last Name: Pane

Email Address: joshpane1@icloud.com

Affiliation: California Bus Association (CBA)

Subject: Background statement of the Charter Bus Industry

Comment:

Good Evening.

I have attached a background from the California Bus Association.

Thank You.

Josh Pane

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-acf-comments-ws-BmcGY1w7WFQKbwdo.pdf>

Original File Name: acf\_comment\_CA Bus Association.pdf

Date and Time Comment Was Submitted: 2021-03-04 17:17:04

No Duplicates.

**Comment 7 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Henry  
Last Name: Rogers  
Email Address: henry@pearstrategies.com  
Affiliation: HAIC

Subject: H2 fuel cell technology for long haul HD drayage trucks  
Comment:

Greetings,

On behalf of the Harbor Association of Industry and Commerce (HAIC), we are submitting the attached letter regarding using H2 fuel cell technology for long-haul drayage trucks.

Thank you for your consideration.

Sincerely,

HENRY ROGERS

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-acf-comments-ws-Vz9VYV0DVWpXNfcj.pdf>

Original File Name: H2 Letter.pdf

Date and Time Comment Was Submitted: 2021-03-18 08:54:13

No Duplicates.

## **Comment 8 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ranji

Last Name: George

Email Address: h2zevforum@gmail.com

Affiliation: Coalition for Advanced ZEV

Subject: The need for a sustainable battery approach

Comment:

For last 30 years, ARB has been promoting battery technology as a means to reach zero-emission goals. As a scientist who previously worked at South Coast AQMD, and was directly involved in launching the battery technology by providing key technical materials to ARB for its 1990 ZEV regulation, and later under Dr. Alan Lloyd, demonstrated the feasibility of hydrogen fuel cells in mid -90s, I am really concerned.

ARB is not addressing the significant battery waste pollution generated by the huge number of battery vehicles being proposed. AB 617 communities will be directly impacted - adversely. These concerns are addressed in more detail in the attachment. To be sustainable, ARB should identify non-cobalt sustainable battery chemistries and be more explicit in its support for hydrogen fuel cells.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-acf-comments-ws-WzlVMgZzU3RVNgl7.pdf>

Original File Name: Batteries in Clean Truck Fleets - Google Docs.pdf

Date and Time Comment Was Submitted: 2021-03-20 22:51:11

No Duplicates.



**Comment 9 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Gregory

Last Name: Reed

Email Address: grr@cullenlaw.com

Affiliation: OOIDA

Subject: Comments of the Owner-Operator Independent Drivers Association

Comment:

Please see the attached comment on the Proposed Advanced Clean Fleets Rulemaking by the Owner-Operator Independent Drivers Association, Inc. (OOIDA).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-acf-comments-ws-WjUHbll6VmEKbVcI.pdf>

Original File Name: OOIDA comments to Proposed Advanced Clean Fleets Rulemaking.pdf

Date and Time Comment Was Submitted: 2021-03-26 18:26:55

No Duplicates.

**Comment 10 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Austin

Last Name: Avery

Email Address: asavery@tid.org

Affiliation: Turlock Irrigation District

Subject: TID Comments on March 4, 2021 Advanced Clean Fleets Workshop

Comment:

TID Comments on March 4, 2021 Advanced Clean Fleets Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-acf-comments-ws-BnIHdAd0WGdVPFQ3.pdf>

Original File Name: Turlock Irrigation District Comments on March 4, 2021 Public Workshop to Discuss the Proposed Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2021-03-30 16:50:11

No Duplicates.

**Comment 11 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: Association of California Water Agencies

Subject: ACWA/CASA Comments on Proposed Advanced Clean Fleets Rule

Comment:

Attached is a Joint Letter submitted by ACWA and CASA regarding the CARB Proposed Advanced Clean Fleets Rule.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-acf-comments-ws-VTRQNQB2BDZQCQFi.pdf>

Original File Name: ACWA\_CASA Joint Letter 033121.pdf

Date and Time Comment Was Submitted: 2021-03-31 15:22:15

No Duplicates.

**Comment 12 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jaron

Last Name: Weston

Email Address: jweston@sdge.com

Affiliation:

Subject: SDG&E Comments on Advanced Clean Fleets March '21 Workshop

Comment:

Please see attached for SDG&E's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-acf-comments-ws-USJdP1w6UmRSCwVk.pdf>

Original File Name: SDGE Advanced Clean Fleets Comments March 2021.pdf

Date and Time Comment Was Submitted: 2021-03-31 16:03:34

No Duplicates.

**Comment 13 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation: Specialty Vehicle Coalition

Subject: Specialty Vehicles and the ACF Rule

Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-acf-comments-ws-VCdRJwNnAjIDbAhp.pdf>

Original File Name: Specialty Vehicle Coalition - April 2, 2021 comment letter.pdf

Date and Time Comment Was Submitted: 2021-04-02 13:53:32

No Duplicates.

**Comment 14 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Katharine

Last Name: Larson

Email Address: klarson@scppa.org

Affiliation: SCPPA

Subject: SCPPA Comments re: Advanced Clean Fleets Proposal

Comment:

Please find attached SCPPA's comments on the proposed Advanced Clean Fleets requirements for public fleets.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-acf-comments-ws-UGAFNwAvB2QFMgMt.pdf>

Original File Name: 04.01.21 ACF Comments.pdf

Date and Time Comment Was Submitted: 2021-04-02 15:44:47

No Duplicates.

## **Comment 15 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: Carollo Engineers

Subject: CASA Comments on the Proposed ACF Rulemaking

Comment:

The California Association of Sanitation Agencies appreciates this opportunity to comment on the Proposed Advanced Clean Fleets Rulemaking as presented by the California Air Resources Board staff during the March 2nd and 4th workshops. We have attached our specific comments and appreciate your willingness to consider our recommendations. Please feel free to contact me at if you have any questions.

Sincerely,

Sarah A. Deslauriers, P.E., ENV SP

Climate Change Program Manager, CASA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-acf-comments-ws-B2FcM1wzUmADaQBf.pdf>

Original File Name:

FINAL\_ProposedCleanFleetRuleWorkshop\_CASACommentLetter\_040221.pdf

Date and Time Comment Was Submitted: 2021-04-02 16:15:02

No Duplicates.

## **Comment 16 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation:

Subject: Recommendations to strengthen and improve the ACF regulation

Comment:

These comments on the Advanced Clean Fleets (ACF) Rule are submitted on behalf of 21 California environmental justice, health, environmental, scientific and labor organizations - all committed to pursuing a zero-emission transportation future in order to protect communities, meet long-overdue commitments for clean air, reduce greenhouse gas emissions to help avoid catastrophic climate change, and stimulate economic recovery and the creation of high-road jobs in the State.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-acf-comments-ws-AmNTNlw7V1sLblM8.pdf>

Original File Name: ACF Coalition Comments 040221-FINAL.pdf

Date and Time Comment Was Submitted: 2021-04-02 16:34:39

No Duplicates.



**Comment 17 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ian

Last Name: MacMillan

Email Address: imacmillan@aqmd.gov

Affiliation: South Coast AQMD

Subject: Comments re:ACF Regulatory Concepts

Comment:

Comments from South Coast AQMD staff.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-acf-comments-ws-WilRNAFhU3FWPQFl.pdf>

Original File Name: SCAQMD ACF comments\_slr\_M<sup>3</sup>\_eo 04-02-2021.pdf

Date and Time Comment Was Submitted: 2021-04-02 17:24:05

No Duplicates.

**Comment 18 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: Resource Recovery Coalition of CA

Subject: Informal Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

Please see the attached informal comments from the Resource Recovery Coalition of California.

Thank you,  
Veronica Pardo

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-acf-comments-ws-VTQHYlw7UFwEawNt.pdf>

Original File Name: ACF\_InformalResourceCoalitionComments.pdf

Date and Time Comment Was Submitted: 2021-04-06 18:52:15

No Duplicates.

## **Comment 19 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jack  
Last Name: Symington  
Email Address: jack@laincubator.org  
Affiliation: LACI

Subject: Advanced Clean Fleets Regulation - Recommendation Letter - LACI and TEP Partners  
Comment:

Hello,

Please see the attached recommendation letter in response to the March 2nd and 4th workshops on the Advanced Clean Fleets Regulation. This letter is being submitted on behalf of the Los Angeles Cleantech Incubator, Itron, AMPLY Power, and PCS Energy.

Best,  
Jack Symington

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-acf-comments-ws-VDVRMwN0VWdROQBj.pdf>

Original File Name: Advanced Clean Fleets\_Comment Letter\_LACI and TEP Partners.pdf

Date and Time Comment Was Submitted: 2021-04-08 12:36:04

No Duplicates.

## **Comment 20 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Janet

Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on ACF Rule Concepts

Comment:

Please find attached comments from the California Council for Environmental and Economic Balance on the proposed regulatory concepts, as presented during the March workshops. These comments were originally submitted via zevfleet@arb.ca.gov on March 31, 2021. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-acf-comments-ws-UDNUMVUxUGZWMLcI.pdf>

Original File Name: CCEEB ACF comments\_31MAR21.pdf

Date and Time Comment Was Submitted: 2021-04-08 12:53:57

No Duplicates.

**Comment 21 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA Comments on Advanced Clean Fleets Proposal

Comment:

Please find attached NCPA's comments on the proposed Advanced Clean Fleets requirements for public fleets.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-acf-comments-ws-Uz1WM1YnBTcDWlAz.pdf>

Original File Name: NCPA\_Comments\_ACF\_Proposal\_04092021.pdf

Date and Time Comment Was Submitted: 2021-04-09 10:08:42

No Duplicates.

**Comment 22 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: SEAN

Last Name: EDGAR

Email Address: SEAN@CLEANFLEETS.NET

Affiliation:

Subject: ACF comments by WSTA and CleanFleets.net

Comment:

The attached were emailed to the zevfleet@arb.ca.gov as noted in the March 2021 workshop slides.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-acf-comments-ws-BnEAdVwpADIBWARl.pdf>

Original File Name: WSTA Attachment 4-8-21 CF Technical Report on Waste Truck Weights Env Benefits 5-12-16.pdf

Date and Time Comment Was Submitted: 2021-04-09 13:09:21

No Duplicates.

**Comment 23 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation:

Subject: SMUD Comments on the Advanced Clean Fleet Regulation

Comment:

Comment received via email, uploaded on Nicole's behalf.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-acf-comments-ws-WyhXPAB0BzAEXQFi.pdf>

Original File Name: SMUD Comments to CARB Proposed Advanced Clean Fleets Regulation 04.09.21-LEG 2021-0051.pdf

Date and Time Comment Was Submitted: 2021-04-09 13:24:55

No Duplicates.

**Comment 24 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: SEAN

Last Name: EDGAR

Email Address: SEAN@CLEANFLEETS.NET

Affiliation:

Subject: ACF comments by WSTA and CleanFleets.net PART 2

Comment:

Please see part two of our comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-acf-comments-ws-AHcBdFAIAzEGLQVm.pdf>

Original File Name: WSTA-CleanFleetsnet Comments on ACF 4-8-21se.pdf

Date and Time Comment Was Submitted: 2021-04-09 15:15:57

No Duplicates.



**Comment 25 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation:

Subject: Coalition Comments

Comment:

See attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-acf-comments-ws-BWZROQdhBSBXMghX.pdf>

Original File Name: CNGVC Coalition Letter on ACF.pdf

Date and Time Comment Was Submitted: 2021-04-09 15:23:45

No Duplicates.

**Comment 26 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: CMUA Comments on Proposed Advanced Clean Fleets Workshops

Comment:

Please see CMUA's comments on the March 2 and March 4 ACF Workshops, attached.

Best Regards,

Frank Harris

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-acf-comments-ws-VDcBagZyWGpWD1Iz.pdf>

Original File Name: CMUA ACF Comments April.9.2021.pdf

Date and Time Comment Was Submitted: 2021-04-09 17:29:00

No Duplicates.

**Comment 27 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA comments on Advanced Clean Fleets

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-acf-comments-ws-UCdTJIUkAzFVDFMy.pdf>

Original File Name: WSPA ACF Workshop Comment Letter\_041721.pdf

Date and Time Comment Was Submitted: 2021-05-10 11:09:43

No Duplicates.

## **Comment 28 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: John

Last Name: Nilsen

Email Address: JBNILSEN@AOL.COM

Affiliation:

Subject: proposed clean fleets rules

Comment:

I am a small business I got rid of a 1998 14,500GVW diesel to comply with the current regulations. I bought a new dump truck to replace the old one and was told as long as its a 2010 or newer vehicle there will be no further requirements to replace the new vehicle and here we go again..... As a small business i received no help paying for the new vehicle which was a \$45,000 hardship!! I cant afford to do that again. I'm 60 years old and don't do enough business to justify replacing the truck again. By the way my old truck is still running strong across the border in Oregon so my \$45,000 hardship has not changed a thing. This is so frustrating and makes me want to vote for politicians like Trump!

I was told my new truck would be good for the life of the truck.

I'm all for clean air but lets phase out old vehicles when they wear out or allow for low use vehicles so we have a history and a supply of Vintage vehicles in the future. you couldn't do this with cars because of the backlash but us small contractors don't have a lobby to defend use or help get us replacement funding like the larger trucking companies have.

Sincerely, John Nilsen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-12 10:54:51

No Duplicates.

## **Comment 29 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Barry

Last Name: Schmall

Email Address: bsspintail@yahoo.com

Affiliation:

Subject: Adv. Clean Fleets Regulations

Comment:

Ridiculous rules from the power hungry idiots that are and have been in charge of CA for the last how many decades. It should be no surprise that the same state that cannot keep the lights on due to stupid decisions regarding electrical grid capacity and power plant shutdowns (read - reliance on poor "renewable" energy sources like solar) are now trying to implement electric fleet vehicles which will need to be charged by this same electrical grid. When the power density of fossil fuels (gas/diesel) can be had by batteries and the market demands them, then this should be a discussion. Until then, put tax money into research for alternative fuel sources instead of artificially moving the market on the backs of the middle class through subsidization to buy vehicles that are not wanted but mandated. Socialism at its finest. Amazing. I guess until every person with common sense leaves CA for better (read "red") states, this is the life that we have.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-19 13:37:03

No Duplicates.

**Comment 30 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sonia

Last Name: TERRY

Email Address: sdyrefrigeration@gmail.com

Affiliation: SDY REFRIGERATION

Subject: Fluorine is the problem

Comment:

It is an amazing topic but the sky temperature hasn't improved. We have all this new stuff; electric cars, solar panels, windmill power generators, geothermal advances but the sky temperature is higher. I suspect the problem really is just too much fluorine in the atmosphere.

Kind regards,

Sonia Terry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-25 21:38:20

No Duplicates.

## **Comment 31 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Alguire

Email Address: ibedanno@yahoo.com

Affiliation: Truck driver

Subject: Advanced clean fleets proposed regulation

Comment:

As a career professional truck driver this proposed regulation would cripple alot of the smaller trucking fleets who will not be able to afford to convert to zero emissions vechiles. It will also force alot of trucking companies to move out of state. Which would cause California to loose money in state taxes, registration and licensing fees. Im not sure if this proposed regulation also includes out of state trucks entering our state you will cripple or economy causing massive shortages in goods. Please reconsider what you are doing. We already lead the country in unrealistic and over the top regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-26 20:14:22

No Duplicates.

## **Comment 32 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Charles

Last Name: Mederos

Email Address: cmederos@otaywater.gov

Affiliation:

Subject: Public Fleet Exemption under 95693.2

Comment:

To whom it may concern:

We are public agency and provide emergency response to support water and wastewater to our customer in the San Diego area. In the proposed regulation and exemption under 95693.2 the language is not very clear since it does have two paragraphs for a public agency to apply for an exemption. Can you provide more clarification? specifically as it relates to emergency response, we need to have a fleet that is readily available to respond and maintain water supply and infrastructure integrity to our region. We are concerned that rolling blackouts and power outages would inhibit our response if we have ZEV in our fleet. we also noticed that under the exemption 75 % of the fleet needs to be ZEV in order to obtain an exemption. Thank you for your consideration.

Respectfully,

Charles Mederos

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-27 09:24:45

No Duplicates.



## **Comment 33 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: NEIL

Last Name: McQueen

Email Address: mcqueenenviro@att.net

Affiliation: McQueen Environmental Consulting

Subject: Reporting date for Advanced Clean Fleets

Comment:

Phyllip Nguyen asked on the Q&A during the ACT workshop if the fleet reporting date can be changed to April 1 since other regulations have March 1 deadlines. I'm seconding that request.

I handle annual NPDES wastewater reporting to the State Water Resources Control Board for a large drinking water utility that will fall under the High Priority reg, and have to prepare over 50 reports that are due on March 1.

Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-09 10:54:01

No Duplicates.

## **Comment 34 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jeramy

Last Name: Ostrander

Email Address: jeramy@evconversions.com

Affiliation: Electric Vehicle Conversions (EVC)

Subject: EV Conversions (Electrofits)

Comment:

Hi,

Thank you for answering questions and listening to comments at todays workshop for ACT & ACF.

I would like to request that more is spoken about the option of converting existing trucks from combustion to electric vs. just buying new ZEV. Many of the CARB certified electric powertrains we are currently using on new OEM cab/chassis will work identical for older models. For example Isuzu NPR is the identical cab/chassis from 1990-present. So, the package we currently install on new applications will also work on older trucks. This helps cut the cost in half and reusing the previous truck is a lot less wasteful. The end result is the same achieving zero emissions.

Kind regards,

Jeramy Ostrander  
EVC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-09 12:54:42

No Duplicates.

## **Comment 35 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: DIANE

Last Name: ENGLER

Email Address: [dianeengler@lacsds.org](mailto:dianeengler@lacsds.org)

Affiliation: SANITATION DISTRICTS OF LOS ANGELES CNTY

Subject: Comments on ACF Rules

Comment:

Hello,

It is in all of our best interests to make implementation of these new regulations successful. If we fail, it will open the door to another generation of diesels on our roads - and in our lungs.

Please consider the following.

I think we need to re-define NZEV. As it stands, NZEVs with electric only miles do not exist, and development of the concept trucks will not be profitable or even likely if sales will be limited to public fleets and then ended in 2035. Also, just because a vehicle can be plugged in, doesn't mean it will be. RNG powered trucks eliminate PM emissions now, have negative GHG profiles, and in the case of 0.02 g/b-hp, can reduce NOx significantly, now.

In the case of fleets providing a public service critical to the public's health and safety, I think we need a class of exemption for "utility critical response vehicles." The use of "emergency vehicle" is already taken, and could be confusing.

Please do not hesitate to reach out to me if I can provide any details on the LACSD RNG fleet or critical response vehicles.

Thanks!

-Diane

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-09 16:05:06

No Duplicates.

## **Comment 36 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Keara

Last Name: Pina

Email Address: kpina@cpisandiego.org

Affiliation: Center on Policy Initiatives

Subject: Worker misclassification must be addressed

Comment:

California needs an Advanced Clean Fleet standard that achieves 100% pollution-free truck sales by 2035 at the latest, closes the drayage loophole, and mandates the retirement of old trucks.

These components will help California take a huge step forward in cutting pollution from the transportation sector, the state's #1 source of greenhouse gas emissions.

In addition to addressing California's worsening climate crisis and improving the health and quality of life of low-income communities, an Advanced Clean Fleet standard that ensures 100% of new truck sales are pollution-free by 2035 can address the chronic exploitation of truck drivers by fleet owners. Now is our chance--as we clean up polluting trucks--to clean up unfair labor practices that harm families and hinder the transition to an all-electric truck fleet.

One of the major barriers to the successful implementation of new clean truck standards is the common trucking industry practice of classifying (and often misclassifying) truck drivers as independent contractors rather than employees. Misclassification is widespread. Over 500 Labor Commission investigations found trucking companies misclassified drivers to benefit their bottom lines with unfair labor practices. Furthermore, it continues to be the dominant model in port drayage, specifically (up to 90% of operated vehicles), and other trucking sectors such as last-mile delivery, long-haul, and specialized short-haul segments.

Misclassification impedes compliance with California's climate and clean air goals. As a result of the systematic barriers misclassified truck drivers face, only 61% of contracted drivers meet California's Truck and Bus Emissions Rule (in comparison to 83% at large fleets). This is an equity issue for drivers who tend to be from low-income communities and communities of color, who disproportionately bear the economic and health burdens of polluting technologies. It is also an equity issue to the cost effects on compliance. Low compliance with clean fleet rules are due to misclassified drivers being unable to afford to upgrade to cleaner, more efficient trucks. This in turn leads to higher particulate matter pollution, mainly from diesel-powered trucks, that are concentrated in communities of color where ports, railyards, and warehouses are located.

The advanced truck fleet standard presents a once-in-a-generation opportunity for CARB to address the exploitation of truck drivers,

which would revitalize local economies and improve health and living conditions in environmental justice communities. Misclassification must be addressed by maintaining a database of all drayage fleets, using the "common ownership and control" definition to identify the "fleet." CARB should also work with the California Workforce Development Board to require a high-road labor criterion as part of the proposed ZEV Fleet Certification.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-10 08:03:37

No Duplicates.

**Comment 37 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: truck retirement proposal from 13 groups

Comment:

see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-acf-comments-ws-VCBcKAZyBzdQPQJd.pdf>

Original File Name: truck retirement proposal from 13 groups 9.8.21.pdf

Date and Time Comment Was Submitted: 2021-09-13 14:22:38

No Duplicates.

**Comment 38 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ray  
Last Name: Pingle  
Email Address: ray\_pingle@msn.com  
Affiliation: Sierra Club California

Subject: CA EV Charging Infrastructure Development Sufficiency  
Comment:

Please see the attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-acf-comments-ws-B2QBZgNdUGYHd1QL.pdf>

Original File Name: CA EV Charging Infrastructure Development Sufficiency 9-21-21.pdf

Date and Time Comment Was Submitted: 2021-09-21 13:02:04

No Duplicates.

## **Comment 39 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Wong

Email Address: nicole@dreamcorps.us

Affiliation: Dream Corps Green For All

Subject: Strengthen the Advanced Clean Fleets Rule

Comment:

Dear Chair Randolph, Executive Director Corey, and Members of the Board,

We, the undersigned, are 298 concerned California residents and Dream Corps Green For All Supporters writing to urge you to pass a regulation that achieves 100% zero-emission truck sales by 2035. Dream Corps Green For All (GFA) is a national social justice nonprofit fighting for a world that is green for all, not green for some. GFA works at the intersection of the environmental, economic justice, and racial justice movements to advance solutions to poverty and pollution.

Low-income communities and communities of color have long-breathed in toxic diesel pollution from the medium and heavy-duty vehicles on our roads at disproportionately higher rates. And our communities are already feeling the effects of climate change: from hotter, drier days to the unbearable smoke and devastating flames of increasingly worse wildfire seasons. CARB's own analyses have projected that a rapid transition to 100% zero-emission trucks by 2035 is necessary to reach California's climate and air quality goals.

We strongly encourage you to phase out the production of new diesel vehicles by 2035 and ramp-up targets to get there. I also urge you to provide support to small businesses and workers in adopting zero-emission trucks to ensure a just transition for all.

The potential benefits of committing to 100% zero-emission truck sales by 2035 are significant and must be set into motion now. A strong rule can prevent numerous premature deaths, improve quality of life for communities with respiratory or cardiovascular issues due to air pollution, reduce health costs and missed workdays, and generate thousands of clean jobs. Please achieve 100% zero-emission truck sales by 2035 to bring cleaner air to our communities as soon as possible.

Sincerely,  
[see attached]

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-acf-comments-ws-VTFWIIA0BTcBalUK.pdf>

Original File Name: Dream Corps Green For All\_List of Comments.pdf



Date and Time Comment Was Submitted: 2021-09-23 14:31:21

No Duplicates.

**Comment 40 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: Resource Recovery Coalition of CA

Subject: Advanced Clean Fleets Regulation Informal Workshop

Comment:

We appreciate the opportunity to provide these comments on the developing ACF regulations. We respectfully request at least one additional workshop prior to the regulations being released for formal rulemaking.

Thank you,

Veronica Pardo

Resource Recovery Coalition of CA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-acf-comments-ws-VDVQMIYhBTdROQVm.pdf>

Original File Name: AdvancedCleanFleets\_ResourceRecoveryCoalitionofCA.pdf

Date and Time Comment Was Submitted: 2021-09-24 14:41:14

No Duplicates.

**Comment 41 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Austin

Last Name: Avery

Email Address: asavery@tid.org

Affiliation: Turlock Irrigation District

Subject: TID Comments on Advanced Clean Fleets Workshop

Comment:

Turlock Irrigation District comments on Advanced Clean Fleets proposal

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-acf-comments-ws-Wi4HdFIhWWYCa1Ix.pdf>

Original File Name: Turlock Irrigation District Comments on September 9 2021 Advanced Clean Fleets Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-24 15:55:01

No Duplicates.

## **Comment 42 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Scott

Last Name: Alguire

Email Address: scott.alguire@usda.gov

Affiliation:

Subject: Fleet

Comment:

I have been working on federal fleets for 31 years. We have spent millions to retrofit our fleets to meet the California standard. The Air Force had hundreds of vehicle that are used a couple times a year to support launches and we put DPFs on them to meet the standard since these 1980s vehicles could not be reproduced for less than the cost of the filter systems.

Now I work for the Forest Service. We have 5000 vehicle in California. We pushed up the dates to replace old fire engines to comply with the fleet rules prohibiting many of our vehicles. Next we need to figure out how we will get low or zero emission vehicles that can function for weeks at a time while pumping hose lays. It's already difficult when a truck shuts down because it was idling or failed regen while providing water to dozen of firefighters.

I ended up in this job 10 years ago when the state cut the funding for the school bus programs. Having a bus, now a propane/hybrid, hauling 40 kids across town may cost the state a few hundred dollars a day. But having 40 vehicles drive the same distance in the traffic they create, along with the damage to infrastructure and stress on Law Enforcement must be significantly higher. Multiply that by 10 for every school in the state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-24 16:11:40

No Duplicates.

**Comment 43 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Glenn

Last Name: Choe

Email Address: glenn.choe@toyota.com

Affiliation: Toyota Motor North America

Subject: Toyota's Comment on Proposed Adv. Clean Fleets Regulation

Comment:

Please see attached comments from Toyota Motor North America on CARB's Adv. Clean Fleets regulation.

thank you

Sincerely,  
Glenn Choe  
Toyota

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-acf-comments-ws-VjcCZwdgUV1QNQJt.pdf>

Original File Name: ACF Comment Toyota 9-24-21.pdf

Date and Time Comment Was Submitted: 2021-09-24 19:31:08

No Duplicates.

**Comment 44 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Gianna

Last Name: Setoudeh

Email Address: gsetoudeh@bhfs.com

Affiliation: Otay Water District

Subject: Advanced Clean Fleets Proposed Rulemaking

Comment:

Thank you for the opportunity to provide comments on the Advanced Clean Fleets Proposed Rulemaking. On behalf of Otay Water District, please see the attached comment letter for your review and consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-acf-comments-ws-VToCcFY2BC4KUwB3.pdf>

Original File Name: Otay Water District Advanced Clean Fleets Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-09-27 11:55:56

No Duplicates.

**Comment 45 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Casey  
Last Name: Smith  
Email Address: CDSmith@sandiego.gov  
Affiliation: City of San Diego

Subject: Response to Advanced Clean Fleets Regulation  
Comment:

Please see attached and thank you for the opportunity to provide written responses.  
Sincerely,  
Casey Smith

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-acf-comments-ws-VzRUO1wpAihQCQFu.pdf>

Original File Name: City of SD.Response to CARB.Advanced Clean Fleets Regulation.September 27.2021.pdf

Date and Time Comment Was Submitted: 2021-09-27 14:06:13

No Duplicates.

**Comment 46 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Dylan

Last Name: Jaff

Email Address: dylan@caleec.com

Affiliation: CR&R Environmental Services

Subject: CR&R Environmental Services - ACF Comments on September 9th Workshop

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-acf-comments-ws-VjVUIF0DUXAFXFU0.pdf>

Original File Name: CR&R ARB Clean Fleet Comments.pdf

Date and Time Comment Was Submitted: 2021-09-27 14:34:41

No Duplicates.



**Comment 47 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Marc

Last Name: Miller

Email Address: marc.miller@volvo.com

Affiliation: Volvo Group

Subject: Volvo Group Comments on Advanced Clean Fleets proposal and 100% ZEV Sales by 2040

Comment:

Please find the attached comments of the Volvo Group to CARB's recent proposals for the Advanced Clean Fleets rule and the ACT amendment for 100% ZEV sales by 2040.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-acf-comments-ws-VyEHbgBtByIGb1MM.docx>

Original File Name: Volvo ACF and ACT+ comments, final, 9-27-21.docx

Date and Time Comment Was Submitted: 2021-09-27 14:53:10

No Duplicates.

**Comment 48 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tracy

Last Name: Fidell

Email Address: tfidell@portoakland.com

Affiliation:

Subject: Port of Oakland comments on proposed Advanced Clean Fleet Regulation

Comment:

Please see attached letter for Port of Oakland comments on the proposed Drayage Fleet and Public Fleet components of the Advanced Clean Fleet Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-acf-comments-ws-VmQGMVxwUjEEOWIv.pdf>

Original File Name: 21-09-27 Port of Oakland ACF comment letter.pdf

Date and Time Comment Was Submitted: 2021-09-27 15:53:58

No Duplicates.

**Comment 49 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Katharine

Last Name: Larson

Email Address: klarson@scppa.org

Affiliation: SCPPA

Subject: SCPPA Comments on September 9th ACF Workshop - Public Fleets Requirements  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-acf-comments-ws-VSZQNQFwAiEKbVAP.pdf>

Original File Name: SCPPA ACF Comments 9.27.21.pdf

Date and Time Comment Was Submitted: 2021-09-27 15:56:00

No Duplicates.

**Comment 50 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation:

Subject: RCRC Comments on Proposed ACF Rulemaking

Comment:

Attached please find RCRC's preliminary comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-acf-comments-ws-VjcFZwN0VmRQOAhr.pdf>

Original File Name: Advanced\_Clean\_Fleets\_Comment\_Ltr\_to\_CARB\_09242021.pdf

Date and Time Comment Was Submitted: 2021-09-27 16:09:45

No Duplicates.

**Comment 51 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Debran

Last Name: Jones Reed

Email Address: dxjones@semprautilities.com

Affiliation: San Diego Gas & Electric

Subject: Draft Regulatory Language and Updated Cost Assumptions for the Advanced Clean Fleets Reg.

Comment:

Comments from Kirstie Raagas on behalf of San Diego Gas & Electric

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-acf-comments-ws-UyBXNQdhAzUAWVQ3.pdf>

Original File Name: SDGE Comments - CARB Draft Advanced Clean Fleets Rule - 9.27.2021.pdf

Date and Time Comment Was Submitted: 2021-09-27 16:26:21

No Duplicates.

**Comment 52 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 53 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: SEAN

Last Name: EDGAR

Email Address: SEAN@CLEANFLEETS.NET

Affiliation: CLEAN FLEETS.NET

Subject: WSTA Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Please see attached comments on behalf of the Western States  
Trucking Association. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-acf-comments-ws-UiVSJwB1UGIBKglq.pdf>

Original File Name: WSTA-CleanFleetsnet Comments on ACF 9-27-21 AS SUBMITTED.pdf

Date and Time Comment Was Submitted: 2021-09-27 17:23:18

No Duplicates.

**Comment 54 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation: California ACF Advocates Coalition

Subject: Workshop Comments on ACF Rulemaking

Comment:

Please find enclosed the comments from 20 environmental justice, scientific, health, labor and environmental advocates.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-acf-comments-ws-AGNXPII+AD4BYgBu.pdf>

Original File Name: Comments on ACF Workshop 092721\_FINAL.pdf

Date and Time Comment Was Submitted: 2021-09-27 17:24:46

No Duplicates.



**Comment 55 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ray  
Last Name: Pingle  
Email Address: Ray\_Pingle@msn.com  
Affiliation: Sierra Club California

Subject: ACF Coalition Comments on ACF TCO Discussion Draft - 9-27-21  
Comment:

Please find attached the California ACF Coalition comments on the TCO Discussion Draft presented at the most recent workshop. The letter is signed by 15 environmental justice, scientific, health, labor and environmental organizations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-acf-comments-ws-BWRTNIYxAw8EYQdo.pdf>

Original File Name: ACF Coalition Comments on ACF TCO Discussion Doc 9-27-21\_FINAL (5pm).pdf

Date and Time Comment Was Submitted: 2021-09-27 17:32:45

No Duplicates.

**Comment 56 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA Comments on Advanced Clean Fleets Proposal

Comment:

NCPA Comments on ACF Workshop and Draft Public Fleets Requirements,  
attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-acf-comments-ws-UD5VMAZ3UGJXDgJj.pdf>

Original File Name: NCPA\_ACF\_Comments\_09272021.pdf

Date and Time Comment Was Submitted: 2021-09-27 19:01:23

No Duplicates.

**Comment 57 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Lung Association ACF workshop comment

Comment:

Thank you for considering our comment on the ACF workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-acf-comments-ws-BWkHdFQ7ADQAWQdm.pdf>

Original File Name: Lung Association\_ACF workshop comments\_9.27.21.pdf

Date and Time Comment Was Submitted: 2021-09-27 19:08:29

No Duplicates.

**Comment 58 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kathy  
Last Name: Lynch  
Email Address: lynch@lynchlobby.com  
Affiliation: CWHC

Subject: CWHC Informal Comments- Advanced Clean Fleets  
Comment:

Attached please find CWHC Informal Comments on Advanced lean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-acf-comments-ws-VDdXMFhVmdVDdAVm.docx>

Original File Name: CARB Comment Letter\_Adv Clean Fleets\_9-27-21\_Final.docx

Date and Time Comment Was Submitted: 2021-09-27 20:47:05

No Duplicates.

**Comment 59 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Orville

Last Name: Thomas

Email Address: Orville.Thomas@thelionelectric.com

Affiliation:

Subject: Lion comments on ACF Rulemaking

Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-acf-comments-ws-AGFTJ1EyWVVXMAFi.pdf>

Original File Name: ARB ACF Letter\_Lion.pdf

Date and Time Comment Was Submitted: 2021-09-27 21:17:41

No Duplicates.

## **Comment 60 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Henry

Last Name: Rogers

Email Address: henry@greypinegroup.com

Affiliation: HAIC

Subject: Comments on CARB Advanced Clean Fleet Workshop on September 9, 2021

Comment:

The Harbor Association of Industry & Commerce (HAIC) is a non-profit industrial and commercial trade association that serves as a united voice on transportation, energy, environmental, and land use issues affecting the harbor business communities. In response to the California Air Resources Board (CARB) September 9, 2021, workshop on the Advanced Clean Fleet (ACF) rule, we refer to earlier comments submitted on March 17, 2021:

1. We would like to see a clear distinction between short-haul and long-haul heavy-duty (HD) trucks.
2. Allow for the accommodation of H2 fuel cell (H2) Zero-Emission Vehicle (ZEV) technology as one of the options for long haul trucks in upcoming drayage truck rulemaking and incentive programs.

Additionally, we are submitting comments on the CARB ACF draft rules and Total Cost of Ownership (TCO) document published on August 25, 2021. This comment letter evaluates both the CARB rule language and the cost calculations used to justify the timing of rule requirements. We have concerns about the acceleration of the rule schedule resulting in high costs in the early years and a disproportionate cost burden on the fleets that are part of the early compliance (drayage trucks and others).

In the battery-electric (BE) truck calculations, we have identified several factors increasing operational cost to short and long-haul operators, including the need for multiple charging stations and extra labor hours. To the extent that H2 trucks are considered as an alternative because of their higher suitability for long haul truck applications, it will be necessary for both H2 truck and H2 fuel production technology to be competitive with BE and diesel technology. Otherwise, the ZEV burden for long-haul trucks will become infeasible.

&#8195;

BE and H2 Vehicle Purchase Price:

The current (2022 delivery) BE truck purchase price is three times the purchase price of an equivalent diesel truck, based on HVIP references and other published sources (including SCAQMD). The assumption that the new BE truck purchase price will drop significantly by 2025 due to manufacturing efficiencies; such a price drop is unlikely.

For H2 trucks, the assumed purchase price decline is even more significant. The H2 truck price is currently approximately 4.0 times the purchase price of an equivalent diesel truck, based on extrapolation of vendor information found on the HVIP website. This

translates to a price drop by a factor of 2.5 in three years (from 2022 to 2025), which again seems unrealistic.

**H2 Fuel Purchase Price:**

In the ACF TCO document, a chart showing H2 fuel price reaching \$5/kg in 2030 and remaining at that level afterward indicates that this is based on a quoted price projection. The \$5/kg is a price target for H2 trucks to be competitive with BE technology, not a price projection for 2030. The current H2 price is well over \$10/kg based on ARB's TCO document and other published sources (available upon request). Such a price drop (from \$10/kg to \$5/kg) is unlikely by 2030. We would recommend that CARB remove the assumption and change the rule timing for long-haul trucks.

As we further hone our environmental standards, we would like to see minimum performance standards for BE and H2 trucks, just as fuel efficiency standards have been set for other vehicles in the past. California has lofty climate goals, and the State has been the leader in green technology. We appreciate CARB's efforts in the rulemaking process and ask the Board to consider these comments on the need to consider H2 fuel cell technology for long-haul drayage trucks. I appreciate your attention on this matter, and we look forward to working with you to achieve a greener California.

Sincerely,

Henry Rogers  
Executive Director  
Harbor Association of Industry & Commerce

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-acf-comments-ws-AGgCZVI6WGhSC1Q1.pdf>

Original File Name: HAIC ACF Comments.pdf

Date and Time Comment Was Submitted: 2021-09-27 21:18:26

No Duplicates.

**Comment 61 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Charles

Last Name: Darensbourg

Email Address: [cdarensbourg@dpw.lacounty.gov](mailto:cdarensbourg@dpw.lacounty.gov)

Affiliation: L.A. County Solid Waste Management

Subject: Comments on the Proposed Advanced Clean Fleets Rulemaking

Comment:

Please see the attached letter dated September 27, 2021, from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force to the California Air Resources Board regarding Comments on Proposed Advanced Clean Fleets Rulemaking as presented on September 9, 2021

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-acf-comments-ws-BWZQOVE9UmwCYVc5.pdf>

Original File Name: Comments on the ACF Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-28 06:54:29

No Duplicates.



**Comment 62 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ben

Last Name: Granholm

Email Address: ben@westernpga.org

Affiliation: Western Propane Gas Association

Subject: Advanced Clean Fleets Regulation

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-acf-comments-ws-VyBXIVYwVGZXDII+.pdf>

Original File Name: WPGA Letter RE ACF Regulation - 9.27.21.pdf

Date and Time Comment Was Submitted: 2021-09-28 09:48:50

No Duplicates.

**Comment 63 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Deepak

Last Name: Rajagopal

Email Address: rdeepak@ioes.ucla.edu

Affiliation:

Subject: Comments on the Draft ACF Total Cost of Ownership Discussion Document

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-acf-comments-ws-ATNcagMwBWcCKQk5.pdf>

Original File Name: 2021-09-26 ACF Comment Letter - UCLA.pdf

Date and Time Comment Was Submitted: 2021-09-28 10:24:33

No Duplicates.

## **Comment 64 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Brian

Last Name: Beveridge

Email Address: bbeveridge@woeip.org

Affiliation: West Oakland Environmental Indicators Pr

Subject: Simplify the Advanced Clean Fleets Program

Comment:

Twelve years ago, our organization assisted hundreds of independent truck owners with the process of applying for the Diesel Particulate Filter grant program. It was a very difficult and complicated process for the owner/operator community, many of whom were less than proficient in English. The application documentation was particularly difficult.

We strongly encourage CARB to design the ACF incentive program to be as simple as possible for applicants. The H-FIT program has been very popular with the industry and quite successful in getting ZE yard tractors into use at the Port of Oakland. The OEM vehicle providers will get the lion's share of the funding, so let them handle the paperwork for the purchasers.

We feel that getting ZE trucks on the road quickly is more important than proving every mile of usage.  
Thank you, Brian Beveridge - Co-Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-01 16:50:13

No Duplicates.

**Comment 65 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Chris

Last Name: Burroughs

Email Address: burroughs@tianet.org

Affiliation:

Subject: TIA Comments to Advanced Clean Fleets Rulemaking

Comment:

Comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-acf-comments-ws-USVUOwFhUI5SNQJm.pdf>

Original File Name: TIA Advanced Clean Fleets Regulation Informal Public Comments FINAL (003) (002).pdf

Date and Time Comment Was Submitted: 2021-10-04 07:35:42

No Duplicates.

## **Comment 66 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Glenn

Last Name: Farrel

Email Address: gfarrel@sdewa.org

Affiliation:

Subject: Advanced Clean Fleets Comment Letter

Comment:

Attached, please find a coalition comment letter submitted by San Diego region water suppliers regarding the proposed Advanced Clean Fleets rule.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-acf-comments-ws-UTBdP1EmUWMLY1Q3.pdf>

Original File Name: Advanced Clean Fleets Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-10-04 10:32:59

No Duplicates.

**Comment 67 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Gary

Last Name: Arant

Email Address: [garant@vcmwd.org](mailto:garant@vcmwd.org)

Affiliation: GM with VCMWD

Subject: Comments on Draft Regulatory Language for Advanced Clean Fleet

Comment:

Valley Center Municipal Water District's Comments on Draft  
Regulatory Language for the Advanced Clean Fleets Regulation Public  
Fleet Requirements

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-acf-comments-ws-AXdVMFY6VnIDYVcI.pdf>

Original File Name: VCMWD CARB Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-10-04 11:21:03

No Duplicates.

**Comment 68 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jack

Last Name: Symington

Email Address: jack@laci.org

Affiliation:

Subject: Proposed Advanced Clean Fleets Rulemaking - Los Angeles Cleantech Incubator  
Comments

Comment:

See attached for Los Angeles Cleantech Incubator (LACI) comment letter in regards to the September 9th Advanced Clean Fleets Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-acf-comments-ws-VzYBZFI1U14BdFI3.pdf>

Original File Name: ACF Sept. Workshop Comment Letter\_LACI.pdf

Date and Time Comment Was Submitted: 2021-10-04 12:19:51

No Duplicates.

**Comment 69 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: ACWA

Subject: ACWA Comments- CARB Advanced Clean Fleets Regulation Comment:  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-acf-comments-ws-WjwFalU6V2ULYQVa.pdf>

Original File Name: FINAL ACWA.pdf

Date and Time Comment Was Submitted: 2021-10-04 14:29:17

No Duplicates.



**Comment 70 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Joy

Last Name: Mastache

Email Address: joy.mastache@smud.org

Affiliation: SMUD

Subject: Advanced Clean Fleets Regulation and Updated Cost Assumptions

Comment:

SMUD's Comments on the September 9, 2021, Advanced Clean Fleets Regulation and Updated Cost Assumptions Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-acf-comments-ws-WyhROgRwBTIDWgNg.pdf>

Original File Name: SMUD Comments Re Proposed ACF Regulation LEG-2021-0122.pdf

Date and Time Comment Was Submitted: 2021-10-04 15:34:10

No Duplicates.

**Comment 71 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: CMUA Comments on Proposed Advanced Clean Fleets Rulemaking

Comment:

Please find attached the comments of the California Municipal Utilities Association addressing the Advanced Clean Fleets Proposed Draft Regulation as presented at the September 9, 2021, workshop.

Respectfully,

Frank Harris  
916-890-6869

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-acf-comments-ws-BWZXPAB0VWcEXQJj.pdf>

Original File Name: CMUA ACF Comments 10.5.2021.pdf

Date and Time Comment Was Submitted: 2021-10-05 12:58:40

No Duplicates.

**Comment 72 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Roxana  
Last Name: Ramirez  
Email Address: rramirez@mwdh2o.com  
Affiliation: Metropolitan Water District

Subject: Metropolitan's Informal Public Comments on the Proposed ACF Rulemaking  
Comment:

CARB ACF Staff,

Please find attached MWD's public comments on the September 9, 2021 ACF draft.

Best Regards,

Roxana Ramirez

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-acf-comments-ws-Am9SI1QxVFgGY1M8.pdf>

Original File Name: MWD Comment Letter on the Proposed Advanced Clean Fleets Rulemaking.pdf

Date and Time Comment Was Submitted: 2021-10-05 14:11:21

No Duplicates.

## **Comment 73 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Wood

Email Address: jewood@parelectric.com

Affiliation: Utility Line Contractor

Subject: Advanced Clean Truck Rule

Comment:

Greetings, I am commenting to make sure that staff understands the challenges utility line contractors will have with the ACT Rule. Please know that our company is in support of clean air goals and environmental stewardship. I recommend for crane trucks and other HD vehicles that will be working in mountainous terrain and other challenging backcountry areas, should be exempted from the ACT Rule. The reason is that at this point and time there are no ZEV's available that can operate in these areas. These vehicles simply perform too many heavy duty functions and will surely be unable to recharge or operate from remote mountainous areas. There will be no battery charging infrastructure close by and the EV's would not be able to run the equipment that is currently powered by the existing low emissions diesel engines - 2010 and newer. Should a ZEV lose charge voltage in one of these areas the cost and time delay would be unmanageable. It is probable that ZEV's just driving to these job sites would be difficult. We must find a way to exempt operations that will be building, repairing and engineering our renewable transmission infrastructure for our State. I do believe it makes good sense for some applications throughout California to move toward the ZEV goals but the application of building and maintaining our energy transmission infrastructure needs to be exempted from this rule at this time. Respectfully, Jeff Wood

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-06 08:17:11

No Duplicates.

## **Comment 74 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Chris

Last Name: Hall

Email Address: chrishall@prodigy.net

Affiliation:

Subject: Backup Vehicle Exemption

Comment:

In the proposed changes to heavy vehicles, the discussion of backup vehicle exemptions included proposals to require snap tests every 6 months instead of annually.

This fails to recognize that backup vehicle exemptions limit those trucks to being driven no more than 1000 miles per year. Thus a snap test every six months would require a test every 500 miles, or less than one tank of diesel fuel. This would put an undue hardship on the owners of these trucks due to the high cost of the snap tests on older trucks. In our case the tests are \$160 per truck because we cannot drive them into Bakersfield since this would require 100 miles roundtrip, thereby greatly reducing the mileage the truck can be driven. Also, there is little likelihood that there would be significant reduction in emissions through increased monitoring due to the low mileage involved.

The mileage limitation originally was imposed to accomplish two purposes:

- 1) Reduce the overall emissions from the trucks by greatly restricting their mileage.
- 2) Enable small businesses to continue using equipment that they could otherwise not afford to replace.

Increasing the frequency of snap tests on these vehicles to every 6 months would put additional burdens on small business owners, driving them out of business.

Chris Hall

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-11 16:18:06

No Duplicates.

**Comment 75 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Vazken  
Last Name: Kassakhian  
Email Address: Vazken.Kassakhian@sce.com  
Affiliation: SCE

Subject: SCE Supports the ACF  
Comment:

Please find SCE's comments on the ACF attached.  
Thank you,  
Vazken Kassakhian  
Regulatory Affairs  
Southern California Edison

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-acf-comments-ws-WiLTNlczBAhXMIQ7.pdf>

Original File Name: SCE Comments 101221.pdf

Date and Time Comment Was Submitted: 2021-10-12 23:17:21

No Duplicates.

**Comment 76 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Leah

Last Name: Silverthorn

Email Address: leah.silverthorn@calchamber.com

Affiliation: California Chamber of Commerce, et al

Subject: Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

Attached is our coalition comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-acf-comments-ws-BmVXMFEiVmdXDghp.pdf>

Original File Name: CARB ACF-Informal Comments 10.13.21.pdf

Date and Time Comment Was Submitted: 2021-10-13 14:43:06

No Duplicates.

**Comment 77 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Steven

Last Name: Brink

Email Address: [steveb@calforests.org](mailto:steveb@calforests.org)

Affiliation: California Forestry Association

Subject: Proposed Advanced Clean Fleets Rulemaking

Comment:

California Forestry Association comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-acf-comments-ws-BTdQZ1dnVjULPAA0.docx>

Original File Name: 211014\_CFA\_\_Comments\_on\_CARB\_draft\_ACT\_Rule.docx

Date and Time Comment Was Submitted: 2021-10-14 15:33:42

No Duplicates.



## **Comment 78 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: david@betterworldgroup.com

Affiliation: Better World Group Advisors

Subject: ACF Coalition recommendations for strengthening accountability and compliance  
Comment:

The undersigned environmental, environmental and social justice, and labor organizations respectfully write to share our comments and recommendations for strengthening the current Advanced Clean Fleets proposals. This set of comments focuses on the need for the strongest possible language to ensure that companies do not unlawfully shift responsibility for compliance onto the backs of their drivers, which not only hurts workers, but also undermines compliance. These comments are in alignment with and support additional comment letters submitted by our coalition on the draft proposed regulatory language.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-acf-comments-ws-VzYGY1w7WFQEY1I2.pdf>

Original File Name: ACF Advocacy Coalition labor misclassification letter\_10.18.21.pdf

Date and Time Comment Was Submitted: 2021-10-18 13:40:52

No Duplicates.

**Comment 79 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Josh  
Last Name: Grodin  
Email Address: josh.grodin@penske.com  
Affiliation: Penske

Subject: Penske - Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

Please find the attached comment letter from Penske Truck Leasing (Penske) re: the proposed Advanced Clean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-acf-comments-ws-WipVNlc4VHRWOwNm.pdf>

Original File Name: Penske ACF Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-10-22 07:48:56

No Duplicates.

**Comment 80 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 81 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Steven

Last Name: Poncelet

Email Address: stevenponcelet@tdpud.org

Affiliation: Truckee Donner Public Utility District

Subject: Truckee Donner PUD ACF Public Fleets Comment Letter

Comment:

Please find the attached public comments on CARB's proposed advanced clean fleets rulemaking from Truckee Donner Public Utility District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-acf-comments-ws-UydWNFYnByECYANc.pdf>

Original File Name: TDPUD CARB ACF Public Fleet Comment Letter FINAL 10-26-21.pdf

Date and Time Comment Was Submitted: 2021-10-26 15:41:46

No Duplicates.

**Comment 82 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Andy

Last Name: Schwartz

Email Address: anschwartz@tesla.com

Affiliation: Tesla, Inc.

Subject: Tesla, Inc.'s Comments re- Draft Regulations and TCO Study

Comment:

Attached please find Tesla, Inc.'s comments regarding the draft regulations and the total cost of ownership discussion document issued in the Advanced Clean Fleets rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-acf-comments-ws-UiYFZgR2AD8EYwVa.pdf>

Original File Name: Tesla Comments on Draft ACF Regulations and TCO Study.pdf

Date and Time Comment Was Submitted: 2021-10-27 08:53:29

No Duplicates.

**Comment 83 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jason

Last Name: Marcia

Email Address: Jason.Marcia@CoronaCA.gov

Affiliation: City of Corona

Subject: City of Corona ACF Comment Letter on Public Agency Requirements

Comment:

Please see the City of Corona's comments on the proposed Advanced Clean Fleets regulation concerning Public Agency requirements.

Best regards,

Jason Marcia

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-acf-comments-ws-WmhWYAc0BWdWfVRl.pdf>

Original File Name: 2021-10-26 Signed CARB ACF Comment Letter 2021.docx.pdf

Date and Time Comment Was Submitted: 2021-10-27 14:13:27

No Duplicates.

## **Comment 84 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Will

Last Name: Brieger

Email Address: will.brieger@gmail.com

Affiliation:

Subject: why exempt workover rigs?

Comment:

The current draft proposal exempts oilfield drilling and workover rigs, presumably because it would be difficult to build or buy a zero emission drilling vehicle. But state policy, reflected in a raft of statutes, regulations, and executive order is contrary. In countless ways, California law seeks to replace petroleum with alternative fuels. See, e.g., Public Resources Code 25000.5. The Governor's Executive Order N-79-20 directs CARB to protect Californians from the impacts of petroleum fuel use, by phasing out the sale of internal combustion vehicles, and directs CalGEM to more vigorously protect Californians from the impacts of oil extraction.

The State having identified petroleum as the problem, why do we want to make it easier or less expensive to pollute our air while extracting a product -- oil -- that is targeted for replacement??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-27 15:38:17

No Duplicates.

**Comment 85 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kat

Last Name: Laker

Email Address: Kat.Laker@allisontransmission.com

Affiliation:

Subject: RE: Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

RE: Informal Public Comments on the Proposed Advanced Clean Fleets  
Rulemaking (acf-comments-ws)

Please see PDF attachment.

Best regards,  
Kat Laker

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-acf-comments-ws-B2YCaFQ5VG4LfgZp.pdf>

Original File Name: Allison Transmission Inc Oct21 Advanced Clean Fleets.pdf

Date and Time Comment Was Submitted: 2021-10-28 13:51:11

No Duplicates.



## **Comment 86 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Northwest Excavating, Inc.

Subject: Advanced Clean Fleets Regulation

Comment:

Dear Chairman Liane M. Randolph and Members of the Staff:

Thank you for giving me the opportunity to write to you today. I am the head mechanic for Northwest Excavating, Inc. a family owned construction business in Southern California employing families and supporting local businesses for more than 50 years. It's difficult conducting a construction business in California due to the regulations in our industry. As you know we have spent millions to comply with the Off-Road Diesel Regulation, On-Road Diesel Regulation and PERP not to mention other State and local agencies.

I would like you to please consider removing the 3/4 ton work truck from the Advanced Clean Fleet Regulation. The construction industry is different from the standard trucking industry. Our problem is we would not be able to charge these vehicles at our terminal / home base because the foreman and operators drive these vehicles to the jobsite then home every night. We would be asking our employees to install charging stations at their personal residents, If that were even possible. Also they would have to be compensated for the added cost to their electrical bill. Some jobsites are more than 100 miles from their home. The other problem is construction jobsites only have temporary power. To charge ZEV trucks the contractor would have to install a diesel generator and a charging station. If nothing else please consider pushing back the implementation of the 3/4 ton work truck to a later date until more infrastructure will be available to support these vehicles. The construction industry will be the ones building this infrastructure. It would be nice if we could use our existing low emission trucks to do that for our community.

Please consider what I have proposed and thank you for your time.

Sincerely,

Ron Nuss

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-28 15:30:48

No Duplicates.

**Comment 87 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Pietro

Last Name: Cambiaso

Email Address: pcambias@ieua.org

Affiliation:

Subject: Public Comments on Proposed Advanced Clean Fleets Rulemaking

Comment:

Please find attached letter from Inland Empire Utilities Agency regarding comments to the California Air Resources Board on proposed Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-acf-comments-ws-VmRRZwMwAGJReldm.pdf>

Original File Name: 2021-10-28 IEUA Comments on Clean Fleets Reg Final.pdf

Date and Time Comment Was Submitted: 2021-10-28 15:45:58

No Duplicates.

## **Comment 88 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Joe

Last Name: Berry

Email Address: jberry@yourcba.com

Affiliation: California Broadcasters Association

Subject: News and Emergency Information

Comment:

Communities rely on our radio and television stations to be their minute-by-minute resource in emergency situations. Often stations will go commercial-free for many hours and sometimes days for around-the-clock coverage of wildfires, floods, etc. from remote or secured areas.

The CBA is concerned that even with significant improvements in technology and reductions in cost, electronic vehicles may not provide the flexibility that vehicles used in the broadcasting industry demand: vehicles can be assigned to travel both short and long distances; can stay on location for extended periods of time without returning to base; locations can vary from urban to remotely rural; and fuel delivery is currently integral to maintaining operations while on locations.

It would be helpful for those industry professionals that do remote, extended location-based work, if you could address how the Board predicts electric vehicle technology will advance to comply with the rules as written. As you can imagine, the locations for the situations we cover are unpredictable and often without power as a result of the emergency. These and other remote locations are reasonably expected to lack charging infrastructure for quite some time.

California Broadcasters Association

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-10-28 16:42:55

No Duplicates.

**Comment 89 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Susan  
Last Name: Griffiths  
Email Address: susan.griffiths@hyliion.com  
Affiliation: Hyliion

Subject: ACF Comment HYLIION, INC.  
Comment:

HYLIION, INC.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-acf-comments-ws-AGMGbF05UWMHb1AP.pdf>

Original File Name: Clean Fleet Comment Hyliion.pdf

Date and Time Comment Was Submitted: 2021-10-28 17:04:44

No Duplicates.

**Comment 90 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Goodsell

Email Address: jmgoodsell@iid.com

Affiliation: Imperial Irrigation District

Subject: IID Comments on the Advanced Clean Fleets Draft Rule

Comment:

For your review and consideration, please accept the attached comment letter from the Imperial Irrigation District.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/102-acf-comments-ws-BmVSNV0uWWgEXQhk.pdf>

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2021-10-28 17:42:30

No Duplicates.

**Comment 91 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Lauren

Last Name: Navarro

Email Address: lnavarro@edf.org

Affiliation: Environmental Defense Fund

Subject: ENVIRONMENTAL DEFENSE FUND RESEARCH AND SUPPORT FOR  
ADOPTION OF ADVANCED CLEAN FLEETS RULE

Comment:

Dear CARB,

Please accept these comments research-based support comments on  
behalf of Environmental Defense Fund (EDF).

Thank you,  
Lauren

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-acf-comments-ws-UjcFZwZhBQkAZwlq.pdf>

Original File Name: EDF ACF Research\_Support Comments FINAL DRAFT 102821.pdf

Date and Time Comment Was Submitted: 2021-10-28 19:03:56

No Duplicates.

**Comment 92 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Timothy  
Last Name: Blubaugh  
Email Address: avujovic@emamail.org  
Affiliation:

Subject: EMA Comments on ACF Rule  
Comment:

Please see the attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-acf-comments-ws-V2VUYIBjVjRSC1Bh.pdf>

Original File Name: 2021 10 29 EMA Comments on Preliminary ACF Regulatory Text.pdf

Date and Time Comment Was Submitted: 2021-10-29 07:41:27

No Duplicates.



## **Comment 93 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tucker

Last Name: Perkins

Email Address: tucker.perkins@propane.com

Affiliation: Propane Education & Research Council

Subject: Comments on the Proposed Advanced Clean Fleets Rulemaking

Comment:

Thank you for the opportunity to provide comments on the draft Advanced Clean Fleets (ACF) regulation proposed by the California Air Resources Board (CARB). The Propane Education & Research Council (PERC) respects the continued investment in climate initiatives pursued by the State of California, and we seek to be a valuable contributor in the development and adoption of this regulation as well as its related policies and procedures.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-acf-comments-ws-UCABYl0uBDQFXABf.pdf>

Original File Name: PERC\_Advanced\_Clean\_Fleets\_Comments\_FINAL\_10292021 (002).pdf

Date and Time Comment Was Submitted: 2021-10-29 09:36:51

No Duplicates.

**Comment 94 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sophie  
Last Name: Ellinghouse  
Email Address: sophie@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments re: ACF Regulation September Workshop  
Comment:

Attached are WSPA's comments on the Advanced Clean Fleets Regulation September Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-acf-comments-ws-VCNSJ1EgADIKU1c2.pdf>

Original File Name: WSPA ACF Comment Letter re September Workshop.pdf

Date and Time Comment Was Submitted: 2021-10-29 09:53:49

No Duplicates.

**Comment 95 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: CMUA Comments on Proposed Advanced Clean Fleets Workshops

Comment:

Please see the attached comments from the California Municipal Utilities Association on the October 6, 2021.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/110-acf-comments-ws-AmEGbVYiUWMGX1A0.pdf>

Original File Name: CMUA Draft ACF Comments 10.29.2021.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:08:49

No Duplicates.

**Comment 96 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: sean

Last Name: waters

Email Address: sean.waters@daimler.com

Affiliation:

Subject: ACF Comments

Comment:

Comments Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-acf-comments-ws-UzdRIwFuUGIGMQY2.pdf>

Original File Name: DTNA1029Comments.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:04:18

No Duplicates.

**Comment 97 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jake

Last Name: Jacoby

Email Address: jjacoby@trala.org

Affiliation: Truck Renting & Leasing Association

Subject: Truck Renting & Leasing Association's Advanced Clean Fleets Regulation Comments  
Comment:

Please accept the attached comments from the Truck Renting and Leasing Association in regards to the California Air Resources Board's Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/112-acf-comments-ws-UCQCdgZmV2hSNVQL.pdf>

Original File Name: TRALA ACF Comments 10.29.21 FINAL.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:24:51

No Duplicates.

**Comment 98 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Oconnor

Email Address: patoconnor@kentoconnor.com

Affiliation: NAFA Fleet Management Association

Subject: Advanced Clean Fleets

Comment:

Attached are the comments of NAFA Fleet Management Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-acf-comments-ws-UzJcOVcwAAwLbIM8.pdf>

Original File Name: ACF comments Oct 29.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:30:31

No Duplicates.

**Comment 99 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Theresa

Last Name: Romanosky

Email Address: tromanosky@aar.org

Affiliation: Association of American Railroads

Subject: Comments of the AAR on CARB's Proposed Advanced Clean Fleets Rulemaking  
Comment:

Attached please find AAR's comments on the Proposed Advanced Clean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-acf-comments-ws-UWBRZ1RnUDoGMgIy.pdf>

Original File Name: 10292021 - AAR Comments on Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:49:00

No Duplicates.

**Comment 100 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Edwards

Email Address: david.edwards@airliquide.com

Affiliation: Air Liquide

Subject: Air Liquide Comments on proposed ACF regulations

Comment:

see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-acf-comments-ws-WmgHmVxvUTMGLQEw.pdf>

Original File Name: 2021-10-29 AL Letter - ACF Docket Comments.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:53:16

No Duplicates.



**Comment 101 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation: OBO the City of Roseville

Subject: City of Roseville comments

Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-acf-comments-ws-VTYAaQd0Aw9WMQdk.pdf>

Original File Name: COR\_ACF Regulation Comments (FNL)-10-29-2021.pdf

Date and Time Comment Was Submitted: 2021-10-29 12:54:04

No Duplicates.

## **Comment 102 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: California Association of Sanitation Age

Subject: CASA Comments on the Proposed ACF Rulemaking

Comment:

Hello,

The California Association of Sanitation Agencies appreciates this opportunity to comment on the Proposed Advanced Clean Fleets Regulation as released and presented by the California Air Resources Board during the September 9th and series of workshops in October, and further appreciate your willingness to consider our recommendations (attached). Please contact me at sdeslauriers@carollo.com if you have any questions.

Sincerely,

Sarah Deslauriers

CASA Climate Change Program Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/117-acf-comments-ws-WjxXOFI9WGpQOgNc.pdf>

Original File Name:

FINAL\_ProposedCleanFleetRuleWorkshop\_CASACommentLetter\_102921.pdf

Date and Time Comment Was Submitted: 2021-10-29 13:14:36

No Duplicates.

**Comment 103 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Daniel E.

Last Name: Cohen

Email Address: dec@cullenlaw.com

Affiliation: Counsel for OOIDA

Subject: OOIDA's Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking

Comment:

Please find attached the comments of the Owner Operator Independent Drivers Association. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-acf-comments-ws-BjRVYwY1UTMAKFBh.pdf>

Original File Name: 2021.10.29, OOIDA ZEV Rulemaking Comments FINAL.pdf

Date and Time Comment Was Submitted: 2021-10-29 13:02:01

No Duplicates.

**Comment 104 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Katharine

Last Name: Larson

Email Address: klarson@scppa.org

Affiliation:

Subject: SCPPA and NCPA Follow-Up Comments on ACF Public Fleets Proposal

Comment:

Please see attached comments from SCPPA and NCPA.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-acf-comments-ws-WjxVOgFuUWNXPVMM.pdf>

Original File Name: FINAL DRAFT SCPPA + NCPA ACF Follow-Up Comments clean.pdf

Date and Time Comment Was Submitted: 2021-10-29 13:54:23

No Duplicates.

**Comment 105 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Chris

Last Name: Nevers

Email Address: cnevers@rivian.com

Affiliation: Rivian

Subject: Rivian Comments on the Proposed ACF Rulemaking

Comment:

Please see the attached comments to Proposed Advanced Clean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-acf-comments-ws-AHJQP1EmBD4GYQFv.pdf>

Original File Name: Rivian ACF Comments (10-29-2021).pdf

Date and Time Comment Was Submitted: 2021-10-29 13:57:02

No Duplicates.

**Comment 106 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Eva

Last Name: Plajzer

Email Address: [plajzere@ranchowater.com](mailto:plajzere@ranchowater.com)

Affiliation: Rancho California Water District

Subject: Comments on Proposed Clean Fleet Rule

Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-acf-comments-ws-BjZTZ1JIWCYCZwFg.pdf>

Original File Name: 026-CARB-Comment Letter-FINAL.pdf

Date and Time Comment Was Submitted: 2021-10-29 13:58:42

No Duplicates.

**Comment 107 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ellis

Last Name: Chiu

Email Address: Ellis.Chiu@ladwp.com

Affiliation: LADWP

Subject: Comments on Advanced Clean Fleets Regulation

Comment:

Please see attached for LADWP's comment letter for Advanced Clean Fleets.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-acf-comments-ws-VDdXMFAjBTRXDlQ1.pdf>

Original File Name: CARB Advanced Clean Fleets LADWP Comment Letter 10-28-21 signed.pdf

Date and Time Comment Was Submitted: 2021-10-29 13:16:57

No Duplicates.

**Comment 108 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Mike

Last Name: Joyce

Email Address: joyce@aalafleet.com

Affiliation: American Automotive Leasing Association

Subject: High Priority and Federal Fleet Reporting Requirements

Comment:

Please see attached comments of the American Automotive Leasing Association.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-acf-comments-ws-UDEFYgNuV2VSCwFi.pdf>

Original File Name: AALA CA CARB Advanced Clean Fleet Comments 10.29.2021.PDF

Date and Time Comment Was Submitted: 2021-10-29 14:26:47

No Duplicates.



**Comment 109 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Suzanne  
Last Name: Seivright-Sutherland  
Email Address: sseivright@calcima.org  
Affiliation: CalCIMA

Subject: CalCIMA comments - ARB ACF high priority and federal fleets and LER  
Comment:

Attached please find CalCIMA's comments regarding ARB's 'Advanced Clean Fleet' regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-acf-comments-ws-UjFdOgBtUmIBbgBt.pdf>

Original File Name: CalCIMA comments - ARB ACF high priority and federal fleets and LER, 10-29-21.pdf

Date and Time Comment Was Submitted: 2021-10-29 14:18:30

No Duplicates.

**Comment 110 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jacqueline  
Last Name: Moore  
Email Address: jmmoore@pmsaship.com  
Affiliation:

Subject: PMSA Comments on Proposed ACF Regulation  
Comment:

Attached are PMSA's comments on the ACF rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-acf-comments-ws-WytWPVUnVWcLUlc0.pdf>

Original File Name: PMSA Comment Letter ACF 10.29.21.pdf

Date and Time Comment Was Submitted: 2021-10-29 14:33:52

No Duplicates.

**Comment 111 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation: California Trucking Association

Subject: CTA-ATA Comments

Comment:

Please see the attached comments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-acf-comments-ws-AGNQLgFhBHoLbFIm.pdf>

Original File Name: CTA-ATA ACF Comments 10292021.pdf

Date and Time Comment Was Submitted: 2021-10-29 15:03:41

No Duplicates.

**Comment 112 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Janet

Last Name: Whittick

Email Address: janetw@cceb.org

Affiliation: CCEEB

Subject: CCEEB Comments on Proposed Draft Advanced Clean Fleets Regulation  
Comment:

Please find comments from the California Council for Environmental and Economic Balance (CCEEB). Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-acf-comments-ws-VWcCNAQ3VTcKIgU0.pdf>

Original File Name: 2021.10.29 CCEEB on ACF\_final.pdf

Date and Time Comment Was Submitted: 2021-10-29 15:27:52

No Duplicates.

**Comment 113 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sara

Last Name: Fitzsimon Nelson

Email Address: [sfitzsimon-nelson@californiahydrogen.org](mailto:sfitzsimon-nelson@californiahydrogen.org)

Affiliation: California Hydrogen Business Council

Subject: California Hydrogen Business Council Comments on ACF Regulation

Comment:

California Hydrogen Business Council Comments on Advanced Clean  
Fleets Regulation Workshops.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-acf-comments-ws-VTZTNFAjVWQLUgNi.pdf>

Original File Name: CARB Advanced Clean Fleets Final CHBC.pdf

Date and Time Comment Was Submitted: 2021-10-29 15:45:09

No Duplicates.

**Comment 114 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Szulc

Email Address: eszulc@calstart.org

Affiliation: CALSTART

Subject: CALSTART Comments on Advanced Clean Fleets

Comment:

See the attachment for CALSTART's comments on Advanced Clean Fleets

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-acf-comments-ws-BWZUM1wxVnZWJABh.pdf>

Original File Name: CALSTART Comments on Advanced Clean Fleets.pdf

Date and Time Comment Was Submitted: 2021-10-29 15:55:37

No Duplicates.

**Comment 115 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Wiltfong

Email Address: sarah.wiltfong@bizfed.org

Affiliation: BizFed

Subject: Advanced Clean Fleets

Comment:

Please find attached a coalition letter signed by 15 business organizations in the Los Angeles region in response to the Proposed Advanced Clean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-acf-comments-ws-VzVUOwF6BTBXNFA0.pdf>

Original File Name: BizFed\_Advanced Clean Fleets\_ Coalition.pdf

Date and Time Comment Was Submitted: 2021-10-29 16:07:26

No Duplicates.

**Comment 116 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Erin  
Last Name: Gardner  
Email Address: erin@futureports.org  
Affiliation: FuturePorts

Subject: FuturePorts Comment Letter on CARB ACF Regulation  
Comment:

Hello,  
Please see our attached comment letter on the CARB Advanced Clean  
Fleets Regulation.  
Thank you,  
Erin Gardner  
FuturePorts

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-acf-comments-ws-UjRWJVYjUXdSJgBl.pdf>

Original File Name: FuturePorts\_CARB ACF Regulation\_Comment Letter\_Final.docx.pdf

Date and Time Comment Was Submitted: 2021-10-29 16:59:22

No Duplicates.



**Comment 117 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: SEAN

Last Name: EDGAR

Email Address: SEAN@CLEANFLEETS.NET

Affiliation: WSTA-CLEANFLEETS

Subject: WESTERN STATES TRUCKING ASSN-ADDITIONAL COMMENTS ON ACF  
Comment:

PLEASE SEE THE ATTACHED SUPPLEMENTAL COMMENTS.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-acf-comments-ws-Wi1VIAdyBDYDKFQ3.pdf>

Original File Name: WSTA-CleanFleetsnet Comments on ACF Cost Document 10-29-2021 LB-SE final.pdf

Date and Time Comment Was Submitted: 2021-10-29 17:10:52

No Duplicates.

**Comment 118 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on ACF Draft Regulation

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-acf-comments-ws-AXECY1YyUl5SOwBj.pdf>

Original File Name: PGE Oct 29 2021 Comments on ACF.pdf

Date and Time Comment Was Submitted: 2021-10-29 17:28:36

No Duplicates.

**Comment 119 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Matt

Last Name: Schrap

Email Address: matt@harbortrucker.com

Affiliation: Harbor Trucking Association (HTA)

Subject: HTA Comments on ACFR

Comment:

Please see attached comments from the Harbor Trucking Association on the draft Advanced Clean Fleet Regulation. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-acf-comments-ws-VDdWMQNwBTRWDwlo.pdf>

Original File Name: CARB ACFR 10-29-21.pdf

Date and Time Comment Was Submitted: 2021-10-29 20:04:42

No Duplicates.

**Comment 120 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation: California Natural Gas Vehicle Coalition

Subject: CNGVC Comment Letter on ACF Draft Language

Comment:

Attached are our comments on the ACF September 9th draft language.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/135-acf-comments-ws-UzAGbgNIUXRRNANc.pdf>

Original File Name: CNGVC ACF Comment Letter on Sept 9 Draft Regulations 102921.pdf

Date and Time Comment Was Submitted: 2021-10-29 21:52:48

No Duplicates.

**Comment 121 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Claire

Last Name: Shapiro

Email Address: [claire@eisen-shapiro.com](mailto:claire@eisen-shapiro.com)

Affiliation:

Subject: NMFTA Comments on Advanced Clean Fleet Regulation

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/136-acf-comments-ws-VjdTMVYhVWcBaVc0.pdf>

Original File Name: Advancedcleanfleetsregulation.comments.pdf

Date and Time Comment Was Submitted: 2021-11-01 10:13:48

No Duplicates.

**Comment 122 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Schenker

Email Address: rebecca.schenker@gladstein.org

Affiliation: Gladstein, Neandross & Associates

Subject: Comments on the Advanced Clean Fleets Regulation Concepts

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/137-acf-comments-ws-VDNROVc3BAgLbgZp.pdf>

Original File Name: GNA Comments on the ACF Regulation October 29, 2021.pdf

Date and Time Comment Was Submitted: 2021-11-01 16:24:37

No Duplicates.

## **Comment 123 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Daren

Last Name: Black

Email Address: daren.black@artofliving.org

Affiliation:

Subject: We need zero emissions ships, shut down pollution

Comment:

Dear Chair Randolph and Members of the Board,

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

Given the climate emergency that we are facing, we need bold climate leadership. I'm asking you to strengthen the Commercial Harbor Craft rule:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule
2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions
3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 16:14:52

No Duplicates.





**Comment 124 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: jaleh

Last Name: donaldson

Email Address: jdonaldson@bhfs.com

Affiliation:

Subject: Support Letter

Comment:

Please accept our letter of support for the Innovative Small e-Fleets proposal on behalf of Assemblymember Cooley.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-acf-comments-ws-UDIdNQZpBTkEdFMy.pdf>

Original File Name: Innovative Small E-fleets - Cooley Support Letter.pdf

Date and Time Comment Was Submitted: 2021-11-17 13:01:36

No Duplicates.

**Comment 125 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: jaleh

Last Name: donaldson

Email Address: jdonaldson@bhfs.com

Affiliation:

Subject: Support Letter

Comment:

Please accept our letter of support for the Innovative Small e-Fleets proposal on behalf of our client Fluid Truck.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-acf-comments-ws-VzRUMwFyAzJSCwdv.pdf>

Original File Name: CARB HVIP Support Letter.pdf

Date and Time Comment Was Submitted: 2021-11-17 14:18:58

No Duplicates.

**Comment 126 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coalit

Subject: HDVIMP

Comment:

The Construction Industry Air Quality (CIAQC) is submitting the attached comment letter regarding the HDVIMP.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/142-acf-comments-ws-BWZcMwNjV3VRNARb.pdf>

Original File Name: CIAQC Comment Letter- HDVIMP-1.pdf

Date and Time Comment Was Submitted: 2021-12-02 14:22:31

No Duplicates.

## **Comment 127 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Charles

Last Name: Darensbourg

Email Address: cdarensbourg@pw.lacounty.gov

Affiliation: Los Angeles County Public Works

Subject: Comments on the ACF Rulemaking

Comment:

Hello,

Attached is a Zip file with the Los Angeles County Public Works' Comment Letter on the Proposed Advanced Clean Fleets Rulemaking and the enclosure with examples of how several State mandates can be achieved simultaneously by utilizing RNG and NZEV Technologies.

Thank you for the opportunity to provide comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/143-acf-comments-ws-USFdLARaUmBXMgNl.zip>

Original File Name: PW ACF Comment Letter and enclosure.zip

Date and Time Comment Was Submitted: 2022-01-03 12:55:32

No Duplicates.

## **Comment 128 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: John

Last Name: Ellingwood

Email Address: jtellingwood@att.net

Affiliation:

Subject: Hybrids

Comment:

<p>Why do you require Hybrids to have smog inspections?</p>  
<p class="MsoNormal"><span style="font-size: 13.5pt; font-family: 'Segoe UI', sans-serif;">Over-regulation of tax paying citizens will weaken your credibility&nbsp;</span></p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-18 17:50:11

No Duplicates.

## **Comment 129 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Greg

Last Name: C.

Email Address: gac37@hotmail.com

Affiliation:

Subject: We Must Clean Up Harbor Boats

Comment:

<p>Harbor boats - including ferries, tugboats,&#8239;barges, and more -&#8239;fuel health and cancer risks in California&rsquo;s port-side communities. In fact, just one sportfishing boat produces the equivalent exhaust of 162 diesel school buses! Just like cars and trucks, boats need to use the cleanest available engines and ultimately move away from fossil fuels in order to combat climate change and protect public health.</p>

<p>The technology already exists to make it happen. By shifting to zero emission and cleaner engine technologies, the new protections will cut carcinogenic diesel particle pollution from harbor craft by 89 percent and will cut smog- and particle-forming NOx by more than half by the end of 2038, resulting in an estimated \$5.25 billion in public health benefits between 2023 and 2038, and avoiding hundreds of premature deaths and hospitalizations.&nbsp;&nbsp;&nbsp;</p>

<p>&nbsp;&nbsp;&nbsp;California's Air Resources Board must vote to&nbsp;&nbsp;&nbsp;require that all short run ferries in California be zero-emission by 2026; mandate cleaner engine upgrades for tugboats and workboats; and&nbsp;&nbsp;&nbsp;create options for all other regulated vessels to either upgrade to cleaner diesel or choose a zero-emission compliance pathway.&nbsp;&nbsp;&nbsp;</p>

<p>Thank you.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-21 15:49:11

No Duplicates.

## **Comment 130 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kislev

Last Name: Ang

Email Address: kang@lawa.org

Affiliation:

Subject: March 1 Deadline

Comment:

I agree that there are a lot of regulatory deadlines on March 1st. For our organization, we have the following air quality deadlines by March 1st.

Gasoline Throughputs

ORD ROARS

AER

CEIR

ZEAS ROARS

PERP

ACC

Refrigerants Registration

Lubricants

RECLAIM

GHG

This does not include California's IGP, CUPA and DTSC reporting requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-24 14:16:17

No Duplicates.

## **Comment 131 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Yasmine  
Last Name: Agelidis  
Email Address: yagelidis@earthjustice.org  
Affiliation: Earthjustice

Subject: ACF Letter - Targeted Fixes to High-Priority Fleets Section  
Comment:

Dear CARB Staff,

Attached please find a letter from our organizations requesting that CARB staff make some key, targeted amendments to the High-Priority Fleets section of the current draft Advanced Clean Fleets rule. We'd be happy to discuss any of this more with you, if that would be helpful.

Thank you again for your hard work in making this a strong rule!

Best,  
Yasmine

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/155-acf-comments-ws-BWkCYVQhUHcCYVQm.pdf>

Original File Name: Letter re ACF Fixes to Priority Fleets Section-Final.pdf

Date and Time Comment Was Submitted: 2022-04-18 15:43:43

No Duplicates.



**Comment 132 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Luis

Last Name: Paredes

Email Address: ktunnek20@gmail.com

Affiliation:

Subject: CARB regulations

Comment:

Just wanted to comment on the as to the taking off line offline of Trucks that don't meet the CARB standards. Some of us that still operate this trucks my or my not have the resources to get into a CARB regulated truck..and with there being a shirt supply and prices almost doubling on the used ones and not being able to afford them Where does that leave the small guy to be able to still operate and provided for ones Family...If there is anything that can be done to help the little guy or program to help us in any way I'd appreciate it

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-25 14:00:02

No Duplicates.

**Comment 133 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: kurt

Last Name: oliver

Email Address: kurtoliver@aol.com

Affiliation: Harbor Express

Subject: Link to get Power Point displays

Comment:

What is the link to get today's power point presentation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 09:41:35

No Duplicates.

**Comment 134 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: MARCO

Last Name: PEREZ

Email Address: marcoperez@hjmintl.com

Affiliation: Director HJM International

Subject: EZV batteries

Comment:

Good morning,

we are a border crossing company and we are worried about the batteries on the EZV because lines to cross the border sometimes go up to 6 to 7 hours, in our recent inquiries to some truck manufacturers they inform us current batteries run for 130 miles and need to recharge, waiting time at the border will drain the batteries.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 10:12:33

No Duplicates.

## **Comment 135 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Mark

Last Name: Roest

Email Address: MarkLRoest@gmail.com

Affiliation: Sustainable Energy Inc., SVCCC.

Subject: Correction to the graph on adoption

Comment:

If you finance the purchase of a solar and battery system sufficient to power both your building and all the vehicles associated with it, and set the monthly payments equal to your savings, after a few years you will have paid it in full, and your energy (and vehicles - they'll last too) will be nearly free for the next 20 to 60 years or more. So the levelized cost of electricity is likely to be under 3 cents per kWh. For this reason and all the quality of life reasons, people will convert existing vehicles before they would otherwise age out. That will raise the curve dramatically -- it may even become analogous to a land rush.

I would like to discuss the additional knowledge behind this statement.

Regards,

Mark Roest

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-06 09:30:14

No Duplicates.

## **Comment 136 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Andy  
Last Name: Schwartz  
Email Address: anschwartz@tesla.com  
Affiliation: Tesla

Subject: Tesla, Inc.'s Comments re- May 2022 Draft ACF Regulations  
Comment:

Attached please find Tesla, Inc's comments regarding the most recent draft of the ACF regulations. Should you have any issues accessing the document, please contact me at anschwartz@tesla.com.

Regards,

Andy Schwartz  
Senior Managing Policy Advisor  
Tesla, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/160-acf-comments-ws-BXFVNlWuVmkDZAFc.pdf>

Original File Name: Tesla Comments\_ACF\_May\_2022.pdf

Date and Time Comment Was Submitted: 2022-05-13 08:39:58

No Duplicates.

## **Comment 137 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Melaura

Last Name: Rice

Email Address: grant.lion@thelionelectric.com

Affiliation: The Lion Electric Co USA Inc.

Subject: The Lion Electric Co USA Inc. Comments - ACF Rule

Comment:

Hello,

Please find The Lion Electric Co. USA Inc.'s comments regarding the proposed ACF Rule attached. We appreciate the opportunity to share our comments on the proposed rule.

Thank you,

Melaura Rice

Grant Coordinator

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/161-acf-comments-ws-AHQFawFlBAhWPAlg.pdf>

Original File Name: The Lion Electric Co. USA Inc. Response \_ final.pdf

Date and Time Comment Was Submitted: 2022-05-13 10:20:07

No Duplicates.

## Comment 138 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.

First Name: Alejandra

Last Name: Mie y Teran

Email Address: amierysteran@otaymesa.org

Affiliation:

Subject: Advanced Clean Fleet Regulations

Comment:

<p class="p1" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000;">On behalf of the Otay Mesa Chamber of Commerce, we would like to comment on the Advanced Clean Fleets regulations being proposed by CARB.</p>

<p class="p2" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000; min-height: 12px;">&nbsp;</p>

<p class="p1" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000;">Otay Mesa is home to California's largest commercial land port of entry with an estimated 7,000-9,000 truck crossings per day (3,500-4,500 northbound and 3,500-4,500 southbound). Otay Mesa has a unique trucking community, which travels to the maritime ports in the Los Angeles area and works with large manufacturers in Baja California. This phenomenon makes some of our truckers -even small size fleet operators-, fall under the high priority fleet category and/or drayage categories which requires very aggressive transition timelines. We request CARB consider the following changes to the Advanced Clean Fleets regulations:</p>

<p class="p2" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000; min-height: 12px;">&nbsp;</p>

<ul class="ul1">

<li class="lil" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke: #000000;"><strong>The January 1, 2024 deadline after which only zero-emission (ZE) drayage trucks may be added to CARB's drayage reporting system should be moved to a future date, when it is actually viable to purchase a ZE truck. Preventing diesel trucks from entering maritime ports will be extremely detrimental to California business and trade.<span class="Apple-converted-space">&nbsp;</span></strong></li>

<li class="lil" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke: #000000;"><strong>The CARB exemption should also consider pricing and not just availability. If there are very few ZE trucks available, pricing could soar and it would be

financially impossible to purchase a ZE truck. Studies show new battery electric trucks cost approximately three times more than the cost of a traditional diesel truck. In addition, the life cycle of a battery electric truck could be much shorter than a regular truck.

It is important for CARB to truly understand the cross-border manufacturing phenomena that moves billions of dollars in both Otay Mesa and Calexico. The amount of truck trips these industries require is certainly not viable to acquire with the new dedicated services being offered and many of them -if not all of them- are restricted from acquiring 100% of trucks trips in California because of Mexican regulations.

**Infrastructure to Fuel/charge Zero Emission Vehicle (ZEV) trucks**

The proposed regulation does not ensure the required infrastructure will be in place to handle re-fueling/charging ZE trucks along important freight corridors. In addition, investments are being focused on maritime ports and highways even though California's land ports are the gateway to commerce in California. There is a complete disconnect between the timeline CARB is

proposing and the development of charging/re-fueling stations which. CARB should not assume this will be coordinated by the private sector and other California agencies.



font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue';  
-webkit-text-stroke-color: #000000; min-height: 12px;">&nbsp;

Currently, there are no plans to develop a ZE re-fueling/charging station in Otay Mesa, other than a small station that could handle 2 trucks and one private fleet operator that is not a cross-border trucker.

Operators that fall under the priority ruling have trucks in Baja California in addition to Otay Mesa and ZE charging/re-fueling stations are not being developed or even planned in Baja California.

- We ask that CARB ensure a public charging/re-fueling station(s) that can handle cross-border trucking needs be funded and built in the vicinity of California's most important commercial land port of entry and the proposed new East Otay Port, so that critical essential goods can keep being transported before the mandate takes place. In FY 2021, more than \$56 billion of imports and exports were processed through the Otay Mesa commercial port of entry.**

**Timeframes for Hydrogen Technology**

Related to timeframes, it is important to note that there are many advantages to hydrogen fuel cell technology, especially for long-haul truck use cases, because hydrogen is lighter, it takes less time to re-fuel, and the range is similar to diesel fuel. Hydrogen technology is several years behind battery electric technology. The Otay Mesa community needs time to wait for hydrogen fuel cell technology to be ready to use,

investing in a large number of electric charging stations that may become obsolete in a few years when companies have more hydrogen options would result in significant financial loss. Time should be given to industry to plan for the use of hydrogen in the next five years (2028).

**Funding Opportunities**

Regarding California's incentive funding programs to comply with this regulation:

- We ask that you consider funding equity by region, vulnerable populations and size of company, so small and medium size Hispanic operators are not left out.**

Before moving forward with this mandate, the California Energy Commission should have an accurate estimate of energy projections for the increased usage these regulations will generate and ensure the PUC has worked out the viability of this additional energy supply with the California utilities. **Specifically**, the energy demand estimates being developed in response to Assembly Bill 2127 (2018) and Senate Bill 643 (2021) should be incorporated into the demand estimate used by the PUC. **It seems quite logical to state but the fact is that these energy estimates have not been quantified or incorporated into any supply plan.**

If approved as is, this new regulation will have a dramatic and catastrophic impact on supply chains and inflation. While we completely agree with the climate action challenges our world is encountering, we respectfully request the following:

<p class="p2" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000; min-height: 12px;">&nbsp;</p>  
 <ul class="ul1">  
 <li class="li1" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke: #000000;"><strong>We ask that the State of California provide an in-depth economic expert analysis of this proposed regulation before implementing, to avoid any potential catastrophic disruptions to our supply chains and California's economy.<span class="Apple-converted-space">&nbsp;</span></strong></li>  
 </ul>  
 <p class="p1" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000;">Finally, while we appreciate CARB's goal to protect vulnerable communities,<span class="Apple-converted-space">&nbsp;</span></p>  
 <p class="p2" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke-color: #000000; min-height: 12px;">&nbsp;</p>  
 <ul class="ul1">  
 <li class="li1" style="margin: 0px; font-variant-numeric: normal; font-variant-east-asian: normal; font-stretch: normal; font-size: 11px; line-height: normal; font-family: 'Helvetica Neue'; -webkit-text-stroke: #000000;"><strong>We ask that CARB be forceful in mandating their land use guideline document to Cities and Counties, which would ensure residential communities are not placed adjacent to industrial areas: a simple solution that would protect families from being placed in heavy truck traffic areas.<span class="Apple-converted-space">&nbsp;</span></strong></li>  
 </ul>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/162-acf-comments-ws-WjtSMFQjAzEBaQZl.pdf>

Original File Name: Advance Clean Fleets Regulation Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-05-17 09:31:25

No Duplicates.

**Comment 139 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Adam

Last Name: Browning

Email Address: [abrowning@forummobility.com](mailto:abrowning@forummobility.com)

Affiliation: Forum Mobility

Subject: Advanced Clean Fleet comments - drayage

Comment:

Thanks for the opportunity to submit comments; please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/163-acf-comments-ws-UDZdNANwUnRSOQhX.pdf>

Original File Name: Forum Mobility - Advanced Clean Fleet Comments 5\_26\_22 (1).pdf

Date and Time Comment Was Submitted: 2022-05-26 13:48:24

No Duplicates.

**Comment 140 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: RCRC

Subject: RCRC Comments on Proposed ACF Rulemaking

Comment:

Attached please find RCRC's comments on the proposed Advanced Clean Fleets Rulemaking. Please contact me if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/164-acf-comments-ws-VzRXMFMgVmcGX1U0.pdf>

Original File Name: CARB ACF Public Fleet Requirements\_COMBINED\_Letter and Text\_2022-05-25\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-05-27 15:00:12

No Duplicates.

## **Comment 141 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Sachs

Email Address: ssachs@ceres.org

Affiliation: Ceres

Subject: Businesses Support a More Ambitious Clean Fleets Rule

Comment:

I'm pleased to deliver a letter signed by 45 major companies, health care systems, and investors in support of a more ambitious Advanced Clean Fleets regulation (see attachment). Signatories represent footprints in over 38 states and strongly support California adopting the most ambitious standards for this regulation to accelerate vehicle electrification across states. They see adopting strong vehicle standards as necessary and feasible, with the potential for significant climate, economic, and public health benefits across the U.S.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/165-acf-comments-ws-UDJWJQd1UmhWPIQx.pdf>

Original File Name: Businesses Support a More Ambitious Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2022-05-31 11:15:32

No Duplicates.

**Comment 142 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Craig  
Last Name: Phillips  
Email Address: Craig.Phillips@FleetCrew.com  
Affiliation: FleetCrew

Subject: Advanced Clean Fleet Rule  
Comment:

So many fleets will not meet the threshold of 50 trucks etc to qualify as High Priority.

It is not clear how if at all the smaller size fleets would be affected by the rule. Do they also have to go ZEV just under their own timeline and by a certain date - do they report as well etc?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-08 09:54:03

No Duplicates.

**Comment 143 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation: CalETC

Subject: CalETC Comments on ACF Rule Second Draft of Proposed Regulation Language  
Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/167-acf-comments-ws-WjkAZ1A9UmRRIwZl.pdf>

Original File Name: CalETC Comments on ACF Rule Second Draft of Proposed Regulation Language FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-09 10:12:35

No Duplicates.



**Comment 144 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Bill  
Last Name: Quinn  
Email Address: billq@cceeb.org  
Affiliation: CCEEB

Subject: CCEEB ACF Comments on May ACF Drafts  
Comment:

<p>CCEEB ACF Comments attached.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/168-acf-comments-ws-ATNRZ1JhVDVWfgAw.pdf>

Original File Name: 2022.06.10 CCEEB Comments on ACF-final.pdf

Date and Time Comment Was Submitted: 2022-06-10 09:57:05

No Duplicates.

## **Comment 145 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive, LLC

Subject: Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

Rivian Automotive, LLC, is pleased to provide informal public comments via the attached letter on the latest draft regulations for the Advanced Clean Fleets rulemaking.

Thank you for the opportunity to comment and please reach out to me with any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/169-acf-comments-ws-B3VcM1wrUmgDZABu.pdf>

Original File Name: Rivian\_ACFProposalComments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-13 12:23:22

No Duplicates.

**Comment 146 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Katharine

Last Name: Larson

Email Address: [klarson@scppa.org](mailto:klarson@scppa.org)

Affiliation:

Subject: Joint POU Comment Letter and Redlines on Second Draft of Public Fleets Rule  
Comment:

<p>Please see attached comment letter.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/170-acf-comments-ws-UTtROFM7U25WJAdY.pdf>

Original File Name: Joint POU Comment Letter and Redlines for April 2022 Draft ACF Rule.pdf

Date and Time Comment Was Submitted: 2022-06-16 16:50:09

No Duplicates.

**Comment 147 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation: SMUD

Subject: SMUD Comments on the May 4, 2022, Advanced Clean Fleets Regulation

Comment:

Sacramento Municipal Utility District's Comments on the May 4,  
2022, Advanced Clean Fleets Regulation Proposed Draft Regulation  
Language, Public Fleets Requirements

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/171-acf-comments-ws-AHNWPVwoUGdRCAFi.pdf>

Original File Name: SMUD Comments on Proposed ACF Regulation 06.23.22\_LEG 2022-0082.pdf

Date and Time Comment Was Submitted: 2022-06-23 09:29:02

No Duplicates.

**Comment 148 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: ACWA

Subject: ACWA Comments on Draft Advanced Clean Fleets Rule

Comment:

Latest ACWA Comments on draft Advanced Clean Fleets Rule (Public  
Fleets Provisions)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/172-acf-comments-ws-AGFXMgN1WGoKUwhr.pdf>

Original File Name: ACWA Clean Fleets Letter\_CARB ACF\_062322.pdf

Date and Time Comment Was Submitted: 2022-06-23 09:49:18

No Duplicates.

**Comment 149 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Adam

Last Name: Harper

Email Address: aharper@calcima.org

Affiliation:

Subject: CalCIMA Comments

Comment:

Attached please find our June Submittal.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/173-acf-comments-ws-AGNVMIwxBTVQPwJv.zip>

Original File Name: CALCIMA ARB High Priority and Federal Fleet Requirements final letter.zip

Date and Time Comment Was Submitted: 2022-07-05 15:44:09

No Duplicates.

**Comment 150 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Josh  
Last Name: Grodin  
Email Address: josh.grodin@penske.com  
Affiliation: Penske

Subject: Penske - Comments on the May 2022 Updated Draft Proposed Advanced Clean Fleets Rulemaking

Comment:

Please find the attached comment letter from Penske Truck Leasing (Penske) re: the May 2022 updated draft of the proposed Advanced Clean Fleets Rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/174-acf-comments-ws-UCBdPIE+VXUEaQJn.pdf>

Original File Name: Penske ACF Comment Letter - July 2022.pdf

Date and Time Comment Was Submitted: 2022-07-06 08:41:05

No Duplicates.

## **Comment 151 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: david@betterworldgroup.com

Affiliation:

Subject: Business Community Support for an Ambitious Advanced Clean Fleets Rule  
Comment:

As business stakeholders operating in California and involved with thousands of businesses, entrepreneurs, and investors 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.

To fully capture the economic development opportunity presented by the state's robust clean energy economy, we urge the California Air Resources Board (CARB) to adopt an ambitious ACF rule that ensures all medium and heavy-duty (MHD) vehicles are zero-emission no later than 2045, with certain categories, such as drayage, fully transitioning to zero emission-vehicles (ZEV) sales sooner.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/175-acf-comments-ws-AGJdLgNxUWtVPQls.pdf>

Original File Name: Business Community ACF Letter.pdf

Date and Time Comment Was Submitted: 2022-07-11 12:05:43

No Duplicates.



**Comment 152 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Coalition of 41 Stakeholders

Subject: Coalition Comment Letter: Advanced Clean Fleets Regulation

Comment:

Please find attached a comment letter from 41 signatories concerning the Advanced Clean Fleets regulation. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/176-acf-comments-ws-BWQGY1A3Ag4EYQZp.pdf>

Original File Name: ACF Coalition Letter July 2022.pdf

Date and Time Comment Was Submitted: 2022-07-11 14:58:32

No Duplicates.

**Comment 153 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Rosalie

Last Name: Barcinas

Email Address: Rosalie.Barcinas@sce.com

Affiliation: SCE

Subject: SCE Support for ACF and Informal Comments

Comment:

Southern California Edison (SCE) supports a successful ACF Rule and appreciates CARB's efforts to address stakeholder concerns in its recent updates to the proposed draft ACF regulation language, which was shared during public workshops on May 2, 4, and 6. SCE also appreciates the opportunity to provide these informal comments and share several recommendations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/177-acf-comments-ws-BnVVMFUxBAGCbQdp.pdf>

Original File Name: SCE Informal ACF Comments. July 2022.pdf

Date and Time Comment Was Submitted: 2022-07-12 13:37:43

No Duplicates.

**Comment 154 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Deborah

Last Name: Sparks

Email Address: debbie.sparks@NMFTA.org

Affiliation: NMFTA

Subject: 2022-07-11 NMFTA ACF Comment Letter

Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/179-acf-comments-ws-UGJQZIVmAGEAKwg4.pdf>

Original File Name: 2022-07-11 NMFTA ACF Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-07-13 11:49:37

No Duplicates.

## **Comment 155 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kwan Kok

Last Name: Ko

Email Address: conradko@gmail.com

Affiliation:

Subject: Please Push Forward HD ICE Ban

Comment:

<p>Currently, the regulation by the state is to ban all new internal combustion engine ("ICE") heavy-duty vehicles ("HDVs") by 2045. Existing vehicles will be allowed to continue to operate. However, due to how long modern ICE HDVs last, a ban by that date will not make meeting the mandate of carbon neutrality by 2050 under the Paris Climate Agreement possible. Most modern ICE HDVs last around 1,000,000 miles before needing replacement, which is around 12-15 years with the normal annual mileage. So, it is recommended that the ICE ban for new HDVs be pushed forward to no later than 2038, preferably 2035, in order to be able to meet the target of net zero emissions by 2050 under the Paris Climate Accord.<br /><br />This is an extremely vital mandate to comply with because anthropogenic climate change ("AGCC") is an existential threat to the human species, which will do so by drastically worsening droughts and increasing wildfires by an unimaginably huge amount, consequently severely dwindling food supplies all over the globe. We've already seen the unprecedented string of wildfires and heat waves since 2017, and even that (the present) is still nothing compared to what will come if society continues on pumping out greenhouse gases at the current rate. This means that the worst is still yet to come. As a result, I strongly urge CARB under CalEPA to take urgent drastic action by banning all new combustion engines outside of light-duty vehicles starting by 2035. Even the State of Washington is doing so by just 5 years after that date (2040), so the State of California, which has historically lead on environmental protection regulations, should not let itself fall behind other states.<br /><br />I would appreciate feedback.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-14 16:49:16

No Duplicates.

## Comment 156 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.

First Name: Sheila

Last Name: Tarbet

Email Address: starbet99@gmail.com

Affiliation: Elders Climate Action

Subject: Advanced Clean Cars II Regulation

Comment:

```
<div dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff;"><span style="font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;">I'm a member of Elders Climate Action, and we ask CARB to strengthen the proposed Advanced Clean Cars II</span></div>
<div style="background-color: #ffffff; font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;"><span style="color: #222222;">regulation by:</span></div>
<div style="background-color: #ffffff; font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;"><span style="color: #222222;">1) advancing the deadline for 100% sale of zero emission Light Duty vehicles from</span></div>
<div style="background-color: #ffffff; font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;"><span style="color: #222222;">2035 to 2030; and</span></div>
<div style="background-color: #ffffff; font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;"><span style="color: #222222;">2) establishing limitations on the operation of internal combustion engine vehicles</span></div>
<div style="background-color: #ffffff; font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;"><span style="color: #222222;">(ICEVs) that progressively reduce the vehicle miles traveled by ICEVs to zero by&nbsp;2035</span></div>
<div dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff;"><span style="font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;">in areas designated &ldquo;severe&rdquo; and &ldquo;extreme&rdquo; under the Clean Air Act.</span></div>
<div dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff;">&nbsp;</div>
<div dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff;"><span style="font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;">Sincerely,&nbsp;</span></div>
<div dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff;"><span style="font-family: Arial, Verdana, Helvetica, sans-serif; font-size: 14px;">Sheila Tarbet</span></div>
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-18 12:02:45

No Duplicates.

**Comment 157 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Frank

Last Name: Sheets

Email Address: laura@houstonmagnani.com

Affiliation: CCMEC

Subject: Comments - May 2 Version Advanced Clean Fleets Draft Language

Comment:

<p>Please respectfully accept the attached comments from the California Cement Manufacturers Environmental Coalition (CCMEC) in regards to the Advanced Clean Fleets (ACF) draft language for high priority fleets issued in May 2022.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/182-acf-comments-ws-BWYFYFE9AjQBZAFe.pdf>

Original File Name: CCMEC CARB ACF Letter 7-18-22.pdf

Date and Time Comment Was Submitted: 2022-07-18 15:50:32

No Duplicates.

**Comment 158 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Jeleni&#263;  
Email Address: tjelenic@pmsaship.com  
Affiliation: PMSA

Subject: Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking  
Comment:

<p>Please see attached comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/183-acf-comments-ws-BXUGbVYkV2UAWQlq.pdf>

Original File Name: PMSA Comments on ACF Workshop 07192022.pdf

Date and Time Comment Was Submitted: 2022-07-19 09:46:50

No Duplicates.



## **Comment 159 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Arant  
Email Address: garant@vcmwtd.org  
Affiliation: Valley Center Municipal Water District

Subject: Advanced Clean Fleets Regulation - Commercial Availability  
Comment:

July 20, 2022

To: California Air Resources Board

From: Gary Arant, General Manager, Valley Center Municipal Water District

Subject: All Clean Fleets Rule - Commercial Availability of EVs

Dear CARB Commissioners and Staff,

Among retail water agencies, there have been ongoing discussions regarding a critical aspect of a successful implementation of this important regulation. In addition to concerns about a very short time frame for implementation, including the timely installation of required on-site charging infrastructure issue, much attention has been focused on the topic of "Commercial Availability" of suitable Vocational EVs (vehicles water and wastewater utilities will use) and how that will be defined in the final regulation.

In our view, there are many important aspects to the term "Commercial Availability".

Available, but in What Quantities?

1. Vocational EVs may be commercially available but are they available in sufficient quantities to create a competitive bidding environment for public agencies?  
Not only should CARB monitor what EVs are commercially available, but also in what quantities are the EVs available to meet the needs of literally hundreds of water, wastewater, and electric utilities to provide a competitive bidding market.

Available but at What Price?

2. In light of regulatory pressure placed on water and wastewater utilities to maintain water and wastewater service affordability, especially to disadvantaged and underserved communities, how much more should a public water/wastewater/ electric utility be required to pay for an EV compared to comparable ICV....30%, 50%, 75%, 100?

CARB ACF regulations need to establish a cost premium cap of 30% beyond which the utility has the option to purchase an ICV.

Available, but what kind of Market?

3. Without items 1 and 2 above, the ACF Regulation is creating a market that requires utilities to purchase Vocational EVs without determining if sufficient quantities exist to create a competitive market and at what cost premium cap. As such, a distorted market emerges where conditions are ripe for unfair pricing (gouging) by EV manufacturers and retailers.

Without mechanisms in place to determine when sufficient numbers of a particular EV are available to create a bid competitive market and has not set a cost premium cap, then it will need to monitor and regulate the marketing and sales practices of EV manufacturers and retailers.

Available, but When?

4. An important component of Commercial Availability is when can the EV be delivered. 3 to 6 months is reasonable and customary, but not 1 to 2-year estimates of which we are aware. The ability of a utility to function and respond is necessarily tied to the possession of critical and specialized equipment.

CARB needs to set a parameter for EV availability with a delivery timeline not to exceed 6 months and if the quoted delivery time exceeds 6 months, the utility should have the option to reject the bid and purchase a comparable ICV.

In Conclusion

These provisions will incentivize EV manufacturers and retailers to produce Vocational EVs in sufficient quantities to facilitate a competitive bidding environment for vehicles priced reasonably comparable to ICV prices and with acceptable delivery periods. While this may delay the effective implementation of ACF at the agency level, it will help to guarantee the long-term success of the regulation.

Thank you for your consideration.

Gary T. Arant  
General Manager

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-20 10:33:15

No Duplicates.

**Comment 160 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Dan

Last Name: Potter

Email Address: dan.potter@daimlertruck.com

Affiliation: Daimler Truck North America

Subject: Daimler Truck North America - ACF Comments

Comment:

Please find attached the comments of Daimler Truck North America on the proposed Advanced Clean Fleets rule.

Sincerely,

Dan Potter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/185-acf-comments-ws-UjYHdVU6BDZQCQZl.pdf>

Original File Name: DTNA\_Comments for ACF\_Regulatory Documents\_August 2022.pdf

Date and Time Comment Was Submitted: 2022-08-04 09:04:26

No Duplicates.

## **Comment 161 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jason

Last Name: Gibeaut

Email Address: [jgibeaut@northstarcsd.org](mailto:jgibeaut@northstarcsd.org)

Affiliation:

Subject: Local Truckee-Tahoe Fire and EMS Comments on Draft ACF Regulation Public Fleet Requirement

Comment:

Please find the attached ACF public fleets comment letter in support of the comments from Truckee-Tahoe public utilities (water, waste-water, and electric) and local governments and their California associations (ACWA, CMUA, CASA, and NCPA).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/186-acf-comments-ws-BmoHblc1U2FXPQRb.pdf>

Original File Name: Local Truckee-Tahoe Fire EMS CARB ACF Support Letter - Final - SIGNED\_signed AR.pdf

Date and Time Comment Was Submitted: 2022-08-05 12:16:17

No Duplicates.

## Comment 162 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.

First Name: William

Last Name: McGrath

Email Address: williammcgrath70@gmail.com

Affiliation:

Subject: Advanced Clean Cars II regulation

Comment:

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<div style="text-align: left;">Please strengthen the proposed
Advanced Clean Cars II</div>
<div>regulation by:</div>
<div>1) advancing the deadline for 100% sale of zero emission Light
Duty vehicles from</div>
<div>2035 to 2030; and</div>
<div>2) establishing limitations on the operation of internal
combustion engine vehicles</div>
<div>(ICEVs) that progressively reduce the vehicle miles traveled
by ICEVs to zero by&nbsp;2035</div>
<div>in areas designated &ldquo;severe&rdquo; and
&ldquo;extreme&rdquo; under the Clean Air Act.</div>
<div>&nbsp;</div>
<div>William McGrath, Walnut Creek CA</div>
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Original File Name:

Date and Time Comment Was Submitted: 2022-08-07 18:43:46

No Duplicates.

**Comment 163 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Jake  
Last Name: Jacoby  
Email Address: jjacoby@trala.org  
Affiliation: TRALA

Subject: TRALA Comments on the Advanced Clean Fleets Regulation  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/188-acf-comments-ws-USUGcgZmUm0KbQFe.pdf>

Original File Name: TRALA 2nd ACF Comment Letter Aug 2022.pdf

Date and Time Comment Was Submitted: 2022-08-09 13:10:02

No Duplicates.

**Comment 164 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ray

Last Name: Pingle

Email Address: Ray\_Pingle@msn.com

Affiliation: Sierra Club California

Subject: CA MHD EV Charging Infrastructure Sufficiency to Support ACF Rule

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/189-acf-comments-ws-AWJT NF0DV2dVO1Ax.pdf>

Original File Name: CA Charging Infrastructure Development Sufficiency to Support Robust ACF Rule 7-28-22 (1).pdf

Date and Time Comment Was Submitted: 2022-08-10 20:32:46

No Duplicates.



**Comment 165 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Christophe

Last Name: LaBelle

Email Address: clabelle@svlg.org

Affiliation: Silicon Valley Leadership Group

Subject: Comments on ACF from SVLG

Comment:

<p>Hello, attached please find a letter with comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/190-acf-comments-ws-AXIFdQRpBzMCWwBj.pdf>

Original File Name: SVLG comments for ACF.pdf

Date and Time Comment Was Submitted: 2022-08-11 12:25:33

No Duplicates.

**Comment 166 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Frank

Last Name: Wolak

Email Address: fwolak@fchea.org

Affiliation:

Subject: FCHEA Comment Regarding Proposed ACF Regulation on High Priority and Federal Fleets

Comment:

Please refer to the attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/191-acf-comments-ws-UTdVMAduVWMGYQNc.pdf>

Original File Name: FCHEA Comment on CARB ACF Proposed Regulation.pdf

Date and Time Comment Was Submitted: 2022-08-12 07:08:00

No Duplicates.

**Comment 167 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: david@betterworldgroup.com

Affiliation: Better World Group

Subject: Labor Recommendations to CARB Concerning the Advanced Clean Fleet Rule  
Comment:

Labor Recommendations to CARB Concerning the Advanced Clean Fleet Rule

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/192-acf-comments-ws-UT0HYFAzBzsAdFQL.pdf>

Original File Name: Labor Recomendations to CARB Concerning the ACF Rule.pdf

Date and Time Comment Was Submitted: 2022-08-12 13:30:57

No Duplicates.

**Comment 168 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: dmariscal.101@gmail.com

Affiliation: Better World Group

Subject: Follow-Up Resources Supporting 100% Sales Target in 2036

Comment:

Follow-Up Resources Supporting 100% Sales Target in 2036

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/193-acf-comments-ws-B2FTOlC6AD8EbVQj.pdf>

Original File Name: Follow-Up Resources Supporting 100 percent Sales Target in 2036.pdf

Date and Time Comment Was Submitted: 2022-08-12 13:41:08

No Duplicates.

**Comment 169 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation:

Subject: SMUD's Comments on the July 26, 2022, Proposed Advanced Clean Fleets Regulation Provisions

Comment:

SMUD's Comments on the July 26, 2022, Proposed Advanced Clean Fleets Regulation Provisions Workgroup Meeting

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/194-acf-comments-ws-VyQBagZyAzQFXAZl.pdf>

Original File Name: SMUD Comments on ACF Exemptions Workshop 08.12.22 - LEG 2022-0117.pdf

Date and Time Comment Was Submitted: 2022-08-12 13:56:23

No Duplicates.

**Comment 170 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: david@betterworldgroup.com

Affiliation: California ACF Advocates Coalition

Subject: The Case for Adopting a Stronger Advanced Clean Fleets Rule

Comment:

The Case for Adopting a Stronger Advanced Clean Fleets Rule

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/195-acf-comments-ws-USUHaVYyVFhSN1Q1.pdf>

Original File Name: The Case for Adopting a Stronger Advanced Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2022-08-15 12:44:48

No Duplicates.

**Comment 171 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: David

Last Name: Mariscal

Email Address: david@betterworldgroup.com

Affiliation: California ACF Advocates Coalition

Subject: The Case for Adopting a Stronger Advanced Clean Fleets Rule

Comment:

This is an updated version of the original file that was submitted yesterday that was also titled "The Case for Adopting a Stronger Advanced Clean Fleets Rule." Please use this version for our public comment, thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/196-acf-comments-ws-AXVSPFUxAAxXMIIz.pdf>

Original File Name: The Case for Adopting a Stronger Advanced Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2022-08-16 09:43:44

No Duplicates.

## **Comment 172 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Tenille

Last Name: Otero

Email Address: totero@otaywater.gov

Affiliation:

Subject: Comments on Draft Reg Language for Advanced Clean Fleets Regulation Fleet Requirements

Comment:

Attached is the Otay Water District's comment letter from our General Manager Jose Martinez on the Draft Regulatory Language for the Advanced Clean Fleets Regulation Public Fleet Requirements. Please contact me at totero@otaywater.gov or at 619-670-2256 or Charles Mederos at cmederos@otaywater.gov or 619-670-2231 if you have any questions regarding our letter.

The Otay Water District provides essential public services including water, recycled water, and sewer services to more than 226,000 customers within approximately 125 square miles of southeastern San Diego County, including the communities of eastern Chula Vista, Bonita, Jamul, Spring Valley, Rancho San Diego, unincorporated areas of El Cajon and La Mesa, and eastern Otay Mesa along the international border with Mexico.

Otay operates a range of vehicles, which serve the purpose of providing day-to-day operations and emergency-response services within its service area. Currently, the District has 86 vehicles in our public fleet including construction, utility repair, utility monitoring, and customer service vehicles.

Thank you for the opportunity to comment.

Tenille Otero  
Communications Officer  
Otay Water District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/197-acf-comments-ws-WzoHZVQjWGpVPQRn.pdf>

Original File Name: Advanced Clean Fleets Comment Letter-OWD August 2022\_FINAL\_JoseMartinez.pdf

Date and Time Comment Was Submitted: 2022-08-16 11:00:35

No Duplicates.



**Comment 173 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: William

Last Name: McDonnell

Email Address: wmcdonnell@ieua.org

Affiliation: Inland Empire Utilities Agency

Subject: IEUA: Considerations for Water and Wastewater Utilities

Comment:

<p>Hello,</p>

<p>IEUA would appreciate the consideration of the comments provided in the attached letter on the proposed advanced clean fleet regulation language. Water and wastewater utilities face unique challenges as essential public services and IEUA hopes the comments provided will assist CARB staff in addressing these unique needs in the regulation language.&nbsp;</p>

<p>&nbsp;</p>

<p>Thank you,</p>

<p>William McDonnell</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/198-acf-comments-ws-Vz5WNQRwBDYGXwlo.pdf>

Original File Name: IEUA Advanced Clean Fleet Letter (Final Draft) SD Signed.pdf

Date and Time Comment Was Submitted: 2022-08-16 12:26:45

No Duplicates.

**Comment 174 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Ellis

Last Name: Chiu

Email Address: ellis.chiu@ladwp.com

Affiliation: LADWP

Subject: Comments on Advanced Clean Fleets Regulation

Comment:

<pre>Please see attached for LADWP's comment letter for Advanced Clean Fleets. </pre>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/199-acf-comments-ws-WjYGYV04WHxRJ1QL.pdf>

Original File Name: LADWP ACF Comment Letter 8-10-22.pdf

Date and Time Comment Was Submitted: 2022-08-17 15:50:57

No Duplicates.

**Comment 175 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Steven

Last Name: Poncelet

Email Address: stevenponcelet@tdpud.org

Affiliation: Truckee Donner Public Utility District

Subject: Truckee-Tahoe Public Agencies Comment on ACF Public Fleets Draft Rule  
Comment:

Please find the attached ACF Public Fleets comment letter on behalf of the local Truckee-Tahoe public water, waste-water, and electric utilities plus local government.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-acf-comments-ws-VDgCawZkUWNWPAIW.zip>

Original File Name: Local Truckee-Tahoe Public Agencies CARB ACF Comment Letter - FINAL 8-17-22 + Attachments.zip

Date and Time Comment Was Submitted: 2022-08-18 10:26:29

No Duplicates.

**Comment 176 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Schenker

Email Address: rebecca.schenker@gladstein.org

Affiliation: GNA

Subject: Comments on the Advanced Clean Fleets Rulemaking Concepts

Comment:

<p>Please see our attached comment letter.&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-acf-comments-ws-Wj1UPARkVWUBZFM8.pdf>

Original File Name: GNA Comments on the ACF Regulation 8.18.22.pdf

Date and Time Comment Was Submitted: 2022-08-18 15:48:50

No Duplicates.

**Comment 177 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Miller

Email Address: kevin.miller@helixwater.org

Affiliation:

Subject: Proposed Advanced Clean Fleets Rulemaking

Comment:

Attached are comments in regards to the rulemaking.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/202-acf-comments-ws-BTcANgEyUzICKQEx.pdf>

Original File Name: 2022-08-19 Helix Water District Comments CARB Fleet Regulations - Final.pdf

Date and Time Comment Was Submitted: 2022-08-19 09:51:34

No Duplicates.

**Comment 178 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Eva

Last Name: Plajzer

Email Address: eplajzer@sdewa.org

Affiliation: San Diego County Water Authority

Subject: Advanced Clean Fleets Regulations Proposed Public Fleet Requirements

Comment:

<p>Please see attached letter.</p>

<p>&nbsp;</p>

<p>Thank you</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-acf-comments-ws-VSZUNIMxWHxQN1QL.pdf>

Original File Name: SDCWA Comment Letter - August 19 2022 CARB Public Fleets.pdf

Date and Time Comment Was Submitted: 2022-08-19 12:20:58

No Duplicates.

## **Comment 179 for Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: sdeslauriers@carollo.com  
Affiliation: CASA

Subject: CASA Comments on the Proposed ACF Rulemaking  
Comment:

<p><span style="font-family: Calibri, sans-serif; font-size: 11pt;">CASA appreciates the opportunity to provide comments on the Proposed Advanced Clean Fleets Regulations, specifically, the Public Fleet Requirements.&nbsp;</span><span style="font-family: Calibri, sans-serif; font-size: 11pt;">We are ready to work closely and collaboratively with you on this critical effort while reliably maintaining essential public and emergency services for all communities under all conditions.&nbsp;</span><span style="font-size: 11pt; font-family: Calibri, sans-serif;">Please contact me with any questions at </span><span style="font-size: 10pt; font-family: Verdana, sans-serif;"><a href="mailto:sdeslauriers@carollo.com"><span style="font-size: 11.0pt; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: major-latin; mso-hansi-theme-font: major-latin; mso-bidi-theme-font: major-latin;">sdeslauriers@carollo.com</span></a></span><span style="font-size: 11pt; font-family: Calibri, sans-serif;"> or at 925-705-6404.</span></p><p>Sincerely,<br />Sarah A Deslauriers<br />CASA Climate Change Program Manager</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/204-acf-comments-ws-VjVQNwByBDYBWAhh.pdf>

Original File Name: CASA Informal Comments\_ACFRegulations-PublicFleetRequirements\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-19 16:19:10

No Duplicates.

**There are no comments posted to Informal Public Comments on the Proposed Advanced Clean Fleets Rulemaking (acf-comments-ws) that were presented during the Workshop at this time.**