



SILICON VALLEY LEADERSHIP GROUP

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🌐 svlg.org

DATE

April 7, 2023

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Silicon Valley Leadership Group

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Clerk of the Board
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: April 2023 Draft Advanced Clean Fleets regulation

Dear Chair Randolph,

The Silicon Valley Leadership Group appreciates the opportunity to comment on the proposed draft Advanced Clean Fleets (ACF) regulation language, published March 23, 2023.

The Leadership Group, founded in 1978 by David Packard of Hewlett-Packard, represents over 350 of Silicon Valley's most respected employers on issues that affect the economic health and quality of life in Silicon Valley. At a high level, our organization believes CARB should employ flexible, market-based and technology-neutral policies that achieve maximum greenhouse gas (GHG) emissions reductions at the lowest cost.

ACF regulations will play a key role in decarbonizing the industrial, goods movement, and transportation sectors. Thoughtful regulations are critical to quickly reducing carbon emissions while maintaining a balanced marketplace and certainty for businesses. Our membership includes many key players in this arena—from companies transitioning to clean fleets, to those producing ZEVs and developing innovative new zero-emission technologies.

Previous Comments

SVLG previously submitted comments on the draft ACF rules published August 30, 2022. These comments articulated the importance of including a credit trading mechanism to allow fleet operators to make decisions to maximize both cost-savings and emissions reductions. Our letter also emphasized the value in having regulatory language that allows for NZEVs, but only in the limited circumstances in which the NZEV operates like a ZEV for a minimum distance and are a compliance alternative only when others are not reasonably or readily available. For further detail, please see SVLG's previous letter as submitted on October 17, 2022.

Infrastructure Delays

The Leadership Group appreciates the inclusion of ZEV Infrastructure Delays and Extensions, including the Site Electrification delay, which align with the Leadership Group's principle of promoting flexible policies while achieving maximum emission reductions. These delays and extensions are a pragmatic response to the very real supply chain and material shortages that continue to impact industry members transitioning fleets to ZEVs. To further support impacted entities, CARB should consider including additional, discretionary extensions for infrastructure development and electrification, or to include a process for CARB staff to permit additional discretionary delays as needed under limited circumstances as unforeseen conditions arise.

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Summarizing Thoughts

The ACF is where rubber meets the road. It is a critical opportunity for California to demonstrate that its actions meet the values outlined in the CARB Scoping Plan by developing ambitious, dynamic regulations that will facilitate the deployment of zero-emission technologies in cost-conscious ways. The Leadership Group appreciates CARB's leadership on this topic and CARB's work in bringing a ZEV future to the trucking industry with a 100% sales goal of 2036.

Sincerely,

Tim McRae
SVP Sustainable Growth
