



October 29, 2021

Richard Corey, Executive Officer  
California Air Resources Board  
1001 I St. Sacramento, CA 95818

Submitted Electronically

RE: Draft Regulatory Language and Updated Cost Assumptions for the Advanced Clean Fleets Regulation

Mr. Corey,

The Harbor Trucking Association (HTA) is a not-for-profit trade association representing harbor drayage carriers serving America's west coast ports. Our members range from the one truck motor carrier to some of the largest fleets in North America.

We submit these comments today in support of the comments submitted by both the California Trucking Association (CTA) and the American Trucking Association (ATA). We specifically support the CTA and ATA comments on both the Drayage Truck Requirements and the Cost Assumption Document included in the initial draft documents of the Advanced Clean Fleets Regulation (ACFR). Our three organizations share many common trucking company members; however, our group is solely focused on Harbor Drayage.

The comprehensive and detailed comments of CTA and ATA outline the major concerns as well as some needed modifications to the ACFR specifically related to the Drayage Truck Requirements. Included in these recommendations is the elimination of the single annual visit requirement for drayage trucks to remain eligible in the Drayage Truck Registry (DTR) and the need for off-ramps that recognize the tremendous challenges fleets will face in meeting the initial zero emissions (ZE) drayage entry requirement beginning November 1, 2023.

It is clear from the CTA and ATA comments as well as several other sets of comments submitted in response to the first series of workshops and initial draft regulatory concept that there are serious concerns related to ZE infrastructure availability and readiness. Therefore, any off-ramps for the initial drayage entry standard should be coupled to availability of publicly accessible fueling infrastructure for ZE vehicles that is able to meet the operational needs of the entire covered drayage fleet.

We look forward to further discussions with staff on this historic regulatory concept and are confident that the agency will work towards a sensible measure that endeavors to meet the ambitious goals set forth by Governor Newsom while simultaneously recognizing the real-world limitations that exist in this sector. Please feel free to connect with me at the information below should you have any questions.

Sincerely,

Matt Schrap, CEO  
Harbor Trucking Association  
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