
From: Richard Damilano <Rdamilano@gocfl.com>
Sent: Thursday, October 13, 2022 10:48 AM
To: ARB Clerk of the Board
Subject: Advanced Clean Fleet Rule

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Dear Clerk of the Board,

[Cherokee Freight Lines] appreciates the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

[This ACF Regulation will again hamper our industry as we (Cherokee Freight Lines) will be mandated to purchase zero emission trucks by 2024.

We are now, as we speak having supply chain issues keeping the newest trucks in the fleet running with sensor, computer, and part backlog due to the ongoing covid-19 pandemic. Currently, we have 250 units in the fleet and around 15-20 units down on any given day. Those units are waiting for parts at 6 different dealerships across the state of California. The ACF regulation will give non-affected entities with less than 50 trucks and brokers a significant competitive advantage over us.

We are a truck-load carrier, and all our units are specifically ordered with weight reducing components. The new "Zero Emission" and Electric trucks are significantly heavier and would not work in our tanker operation. Currently, all our 3-axle tractors are under a 16,500 lb. limit when fully fueled. This is so that we can fully fill the 6,500-gallon tank with wine. Filling the tank to the max helps reduce the amount of oxygen from dissolving into the wine.

There is also the factor regarding the vehicles travel range. At this time, the average diesel tractor in our fleet can achieve anywhere from 6-8 miles per gallon with 110 gallons in the tank. These 660 to 880 miles between fill ups, are currently 32-76% further than the best electric semis on the market. Currently, we as a state do not have the minimum required infrastructure (charging stations or power grid) to make routing the trucks viable on our (Cherokee Freight Lines) intermediate length routes.

Back in 2017, Cherokee Freight Lines switched away from traditional diesel to Neste's "My Renewable Diesel" which is known to emit 75% less greenhouse gasses. Since then, Cherokee has purchased over 1 million gallons of Neste. We believe that this is a major step towards reducing carbon emissions and improving California's air quality.

Speaking from years of experience and an advanced understanding of the California logistics industry, we believe that the Air Resources Board's goal of reducing fossil fuel consumption would be better achieved by causing carriers to switch to biodiesels and renewables (like Neste "My Renewable Diesel"). This would be the most painless transition and one that would see immediate benefits compared to mandating EV's to be purchased after 2024. Doing so would make sure that no business gains an unfair advantage. This would also grant California the time needed to work on the power grid so that when the switch to Electric vehicles takes full effect, the state will be ready.]

We urge you to amend the ACF regulation for more flexibility so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,
[Cherokee Freight Lines]

Sincerely,

Richard Damilano
3655 Cherokee Rd
Stockton, CA 95205
Rdamilano@gocfl.com