

Bascomb Grecian

October 13th, 2022

Clerk of the Board

California Air Resources Board

1001 I Street, Sacramento, California 95814

RE: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation

As a concerned citizen of California, I vehemently oppose any adoption of an accelerated California Air Resources Board “Clean Fleets Rule”. I oppose any “Clean Fleets Regulation”. California simply does not need this. California consumers do not need this. The California trucking industry does not need this. The California economy does not need this. Consumers need to win. The fuel industry needs to prevail.

As a concerned citizen of California, I respectfully oppose and disagree wholeheartedly with the adoption of the Advanced Clean Fleets rule as it attempts to inefficiently transition the entire diesel transportation sector in California. The rule is unjustly attempting to decarbonize the entire California economy under the pretense of a **false energy crisis** that is being exacerbated and created with high fuel taxes and over-regulation.

Accelerating the “Clean Fleets Rule” shows over-regulation in the current state of the industry. The California petroleum industry is facing severe diesel supply shortages, unjust over-regulation, and there is zero justification to make this situation worse by mandating the ZEV Truck come into the market sooner. If ZEV Trucks are a better option for California trucking fleets, then the free market mechanisms in place now will show this eventually. The intervention through advancing the rule is not a free market mechanism. This is an example of over-regulation.

This Advancement of a Clean Fleets “Rule” that is proposed is without merit, and should be construed by the fuel industry as bad faith. This acceleration proposed is without sufficient regard to the myriad of local based minority/family run established fuel distributors and fuel marketers, minority/family run truck stops and minority/locally owned family run neighborhood fueling facilities. Small minority/locally owned trucking fleets that have been providing reliable, stable & abundant low cost energy to the people of California for over 75 years are affected. This idea of accelerating the Clean Fleets Rule will create an energy crisis in California.

The State of California has attempted to mitigate the “effects of a Climate Crisis” through ridiculously burdensome taxation that is passed on to the consumer, at terminal refinery level. The hidden taxes that are over-burdensome to consumers and further hidden to the end user is a social injustice.

On every gallon of diesel sold in California, there is a “Greenhouse Gas Charge” of \$0.27 cents. Then there is a Low Carbon Fuel Standard “tax” of \$0.09 cents per gallon. If these hidden taxes actually are effective in reducing “Climate Change”, then why is CARB proposing that diesel trucks which are so vital to the economic health of California, should have to be phased out in this manner all of the sudden so aggressively with such urgency? Does the Greenhouse Gas Charge of \$0.27 reduce Greenhouse Gases or not?

The regulation’s proposed timeline will place significant strain on the transportation industry and gravely hamper goods movement in the state. Further, this timeline will severely damage a fragile, inflation-laden California economy. These increased high living costs will add to the social injustice. Is that ultimate goal for the Golden State?

The cost of replacing fleets with entirely zero emissions vehicles is not even reasonable. This will unduly harm small businesses in the state. The trucking industry has a very limited supply and a limited choice of consumer options for heavy duty ZEVs. ZEV trucks will effectively put small companies out of business. Manufacturers as compared to their small business counterparts will begin to prioritize larger companies with greater capital. The highly restrictive timeline that is now being proposed will indeed only serve to further exacerbate the energy crisis and the current energy delivery problem in the Golden State.

Additionally, significantly increasing the operating costs of the transportation and goods movement sector within the state will ultimately harm our most vulnerable communities and residents the most. Low-income households in this state are already withstanding the worst of increased electricity costs, which will only be further intensified by the adoption of this regulation as California’s unreliable electricity grid continues to be strained beyond capacity. That is another example of real social injustice. All the small business owners, and people of California who take great pride in serving our communities, will see the impacts of this proposed regulation on the costs of goods and necessities, such as food, water, and fuel, are of concern.

I sincerely and respectfully, urge the Board to consider the deeply unsettling ramifications of bottlenecks in our fuel, food, water, and medical supplies, in addition to every industry that moves goods on heavy-duty vehicles within the state.

The false idea that fossil fuels’ climate impacts are an “emergency” that requires The California Air Resources Board to rapidly eliminate low cost, reliable transportation fuels will cause an energy emergency for the people of California. Is that the goal?

Due to the unreasonable fuel taxes in California, the people of California are experiencing the **worst energy crisis since the 1970s**, and the CARB Advanced Clean Fleets rule will make the crisis far worse. **Skyrocketing energy prices are driving price inflation in every area** of area in California.

- What is the intelligent solution to the California energy emergency?

We must **rethink the cause: The induced “climate emergency” campaign to rapidly eliminate fossil fuels** from the State.

- While “climate change”—humans impacting climate—is real, “climate emergency” is not. The world is slowly becoming warmer—at a cold point in geological history. This doesn’t at all justify rapidly restricting continued fossil fuel use in California.
- The truth is that **fossil fuels’ CO2 emissions have contributed to the warming of the last 170 years**, but that warming has been **mild—1° C, mostly in the colder parts of the world**. And life on Earth thrived (and was far greener) when CO2 levels were at least 5X higher than today’s.
- **Fossil fuels actually overall make us far safer from climate** by providing low-cost energy for the amazing machines that protect us against storms, protect us against extreme temperatures, and alleviate drought. These are the real emergencies.
- **Even the UN Intergovernmental Panel on Climate Change (IPCC)**, which has a history of catastrophizing fossil fuels’ climate impacts and ignoring their climate benefits, **contemplates no scenario in which overall well-being declines due to climate change**.

For these reasons, I must respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,

Bascomb Grecian