
From: Allen Genetti <ag@caltank.com>
Sent: Thursday, October 13, 2022 10:48 AM
To: ARB Clerk of the Board
Subject: Fix the ACF (acf2022)

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Dear Clerk of the Board,

Chemical Transfer Co. appreciates the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

As a 50 plus fleet we cannot afford to phase in electric vehicles in the time frame CARB has proposed. Not sure how the board came to the realization that a 50 plus fleet can afford to transform to an electric feet with no grants or incentives vs a 50 and under truck fleet? This will devastate us financially to the point of putting us out of business. We have been in business in CA for over 75 years (third generation) If this is expected in the time frame proposed we need grants and financial help. I am all about moving to a zero fossil free environment but we need to phase it in over a financially realistic time period. Regardless of fleet size this proposal is too aggressive from a phase in period and will eliminate all the 50-200 vehicle fleets in California, thus only leaving a select few very large carriers still standing. With that there will be no competition and freight rates will continue to sky rocket. We just need a longer phase in period. The technology and electric grid is not there yet.

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,
Chemical Transfer Co
Allen L. Genetti CPA, CFO

Sincerely,

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