



October 11, 2022

Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: ***Proposed Advanced Clean Fleet Regulation Comments***

Chair Randolph, Vice Chair Berg, and CARB Board Members:

On behalf of the above signed organizations, we appreciate the opportunity to comment on the California Air Resources Board's (CARB) proposed Advanced Clean Fleets (ACF) regulation. Our coalition consists of agricultural organizations that supply food and fiber throughout the world. Our organizations understand the emphasis placed on heavy and medium-duty truck conversion to achieve ambitious emission reduction goals set forth in CARB's state strategies. Unfortunately, the rapid conversion requirements of specific equipment categories will result in significant impacts to goods movement, and further exacerbate the difficulties many of our members have experienced.

Over the past two years, the agricultural industry has been at the mercy of manufacturers for various components necessary to stay in business. Wait times ranging from 6 months after order, to a year and half and beyond, have caused considerable damage to normal operations over this time. Items experiencing the longest delays include replacement parts, tractors, even replacement vehicles. We do not anticipate these order delays to be resolved within the next year. Delays in equipment manufacturing cause delays in goods shipments. Over these past two years, numerous contracts and orders for commodity deliveries had to be cancelled due to the unreliability of getting our commodities into a container and out onto a ship. Millions of dollars were lost in that process, with many buyers finding commodities elsewhere as opposed

to renewing contracts for California grown commodities. These cancellations have long lasting influence on our member organization's ability to remain in business.

Our groups have participated and attended various CARB updates specific to the proposed ACF regulation. CARB staff have continuously highlighted that the list of ZEV manufacturers have increased in the past several years. While we understand that variety may be suitable for other equipment category types, many of our processing members rely on several larger manufacturers to supply their goods-movement equipment. We expect these manufacturers to be inundated with equipment orders, and as a result, pass along further delays and increased costs in fulfilling industry orders. Again, delays in equipment delivery will further complicate goods movement in the state.

Several CARB workshops have highlighted the advancement of the current ZEV capabilities, emphasizing charge times and range of the new equipment. Speaking to drayage trucks, there are currently no ZEV model that can make a round trip shipment from the Central Valley to either Ports at Oakland, Los Angeles and Long Beach. The pop-up sites utilized at the Port of Oakland were helpful in keeping operating time low for this equipment, however, most of our trucks drive in to the port to deliver and pick up containers. The impacts of limited on-road capabilities, partnered with changes to the Federal Motor Carrier Hours of Service time, drivers will have to delay container deliveries significantly in the future. We cannot add more unnecessary delays onto the backs of commodity processors.

Last month, all of us within the State of California experienced the potential threat of mandatory power shutoffs in various parts of the state due to lack of available energy to power the grid. Many of the rules CARB and the current Administration have introduced in the last two years will only add further stress the grid. We understand that the recent threat of power shutoffs puts further emphasis on power companies to adjust their energy procurement and accounting standards, but these changes will not be made in the short time frame needed to provide security to the increased demand of total ZEV turnover. We request further assurance and proof that energy providers will be able to handle the increased demand caused by increased medium and heavy-duty ZEV use, as well as the assurance that site specific installation requirements for charging stations and other infrastructure will not be handled with longer delays in operation.

We thank you for the opportunity to comment on the proposed rule. Should you have any questions, please feel free to reach out to me at (559) 455-9272.

A handwritten signature in black ink, reading "Chris McGlothlin". The signature is fluid and cursive, with the first name "Chris" and last name "McGlothlin" clearly distinguishable.

Chris McGlothlin

Director of Technical Services

California Cotton Ginners and Growers Association

Western Agricultural Processors Association