



Air Resources Regulatory Experts

March 25, 2021

The Honorable Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Ref: Open Comment-Authorize the Executive Officer to Extend "Large Entity Reporting" Deadline beyond April 1, 2021

Chair Randolph and Board Members:

CleanFleets.net assists several hundred truck fleet owners and public agencies to report and comply with CARB regulations. Today I am again asking for you an extension to the Large Entity Reporting that is due a week from today. Last June, the Board directed that all public agencies in CA and thousands of business entities provide detailed facility and vehicle information to be used for the Advanced Clean Fleets regulation development.

Extending the reporting deadline by a 30-60 period is a reasonable request given the following chronology:

- June-December 2020: one public workshop with a draft Reporting Guide.
- January 15, 2021: first public notice went out stating that reporting was open and reporting entities "may voluntarily provide information at this time." Note that with TRUCRS annual reporting due 1/31 and many regulated entities working remotely this messaging did not create urgency.
- February to March 15, 2021: multiple LER Report spreadsheet tool revisions posted by CARB staff. This indicates to me that the tools that staff developed over the prior 8 months were not ready for public use. Note that with DOORS reporting for offroad annual reports by public agencies and the construction and logistics industries due on March 1 and the CARB message that reporting was still voluntary.
- March 16 (9 days ago) the "official" notice of mandatory reporting went out to the public. Once again, prior to last week the Board website stated that the LER reporting was "voluntary." My group has been in constant contact with LER reporting staff. While I compliment that they are polite in the face of anxiety from folks like me that are scrambling to comply with this immediate deadline it is clear that problems with the LER Report form remain. If staff were ready then we would not have seen more than five LER reporting form revisions over the last two weeks.

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In conclusion:

- Board Resolution 20-19 (at p. 9) delegates to the Executive Officer Corey the ability to grant the 30-60 day extension I am requesting;
- The request is reasonable given the circumstances above;
- Both the State and Federal Tax Deadlines for individuals have been postponed until May 17, 2021 for good cause;
- Consider the impacts of sticking with the April 1 deadline: rushed data is inaccurate data. So it will only hurt your ACF planning effort staying the course. I have spent the last 17 years of my career collecting and reporting complex fleet data across multiple ARB programs and failing to grant the extension will only serve to leave a bad taste in the mouth of the very entities that CARB needs to "buy in" to what will be the costliest (and unfunded) fleet mandate ever.

If you require additional information you may call me at 916-520-6040 Ext 104.

Sincerely,

A handwritten signature in blue ink, appearing to read "SEdgar", is written over the printed name.

Sean Edgar
Director