To Whom It May Concern:

The proposed Advanced Clean Fleets Regulation, specifically related to drayage trucks, is not feasible to be implemented by January 1, 2024.

ACF is allowing other transportation sectors to slowly phase in ZEVs into their fleet, but all new drayage trucks being registered must be zero-emission starting 2024. Drayage trucks need more flexibility under ACF as electric vehicles will not fit the needs of the routes they deliver to. The issues include the range of EVs, charging times, the infrastructure to accommodate ZEVs, and the price and availability of ZEVs

There is a misconception that drayage trucks stay within ports and never travel long distances. Although there are some that stay within the port, many drayage truckers go over 60 miles one-way to drop off a container picked up from the port. A prime example would be the Central Valley where much of the cargo from the Port of Oakland goes.

Motor carriers pick up loaded containers directly from the Port of Oakland to deliver to areas such as Stockton, Modesto, Manteca, Woodland, and other nearby cities. They would then need to bring an empty container back to the Port of Oakland which makes these well over 100 miles round-trip.

The advertised ranges of class 8 EVs state the vehicles can go anywhere between 150-300 miles on a single charge. However, the estimated ranges are based on power-only without any payloads. The range of EVs are much less after accounting for the additional weight they must haul.

My organization currently owns three BYD EVs and have tested doing round-trips from the Port of Oakland to Manteca with payloads which is about 130 miles. Our drivers had less than 10% battery when they returned to the Port of Oakland after one trip. The drivers advised they were concerned they would not make it and drove very conservatively to reduce battery depletion.
The Port of Oakland also tried conducting a test with a different EV and was not even able to complete a round-trip to Tracy.

Carriers are paid by the number of deliveries completed and each trucker needs at least two round-trips to such distances on a daily basis to stay in business. With an EV, they would only be able to complete one trip before needing to charge for hours.

Under the Federal Motor Safety Administration's Hours-of-Service regulations, truckers can only operate a total of 14 hours a day including breaks. If truckers must charge their vehicles in between deliveries and wait between 30-60 minutes for a partial charge, this will also give them less time to complete deliveries. This could reduce the number of deliveries they can make, and even incentivize drivers to drive dangerously by speeding so they can complete their deliveries before the 14-hour limit.

In addition to the issues above, ZEVs are heavier than diesel trucks by about 8,000 lbs. to 12,000 lbs. This would require many heavy containers arriving at the port to be broken into multiple deliveries to meet weight requirements to be road legal. A delivery that could normally have been completed with one trip on a diesel truck, may need two trips instead with an electric vehicle. The additional 2,000 lbs. maximum weight electric vehicles will be allowed to haul is not enough to cover the weight of the battery.

There is also no infrastructure to charge heavy-duty class 8 vehicles. CARB and energy companies are focusing their efforts to create private charging stations but there are many motor carriers that rely on public fueling stations and cannot install a private charger. There are few/no public chargers and no secure areas to drop off a trailer if a vehicle needs to be charged mid-route. Charging times are also slow so truckers may be waiting for hours in line to charge with the limited public charging available.Many motor carriers, especially small businesses, cannot install private chargers. They rent parking spaces, park on public streets, or park at home.

Cost is another big factor that will make it difficult for small drayage motor carriers to meet the ACF requirements. Heavy-duty electric trucks are very expensive, and many carriers usually buy used trucks since they are more affordable. Since EVs are in their first generation, there will be very few used EVs in the market if any. Motor carriers will be required to spend around five times the amount to purchase a new electric vehicle compared to a used diesel vehicle.
The ACF regulation will potentially put a lot of small motor carriers out of business due to the financial burden of complying with the vehicle requirements.

This will further put strain in the global supply chain as there will be fewer drayage trucks operating in California. Consumers may have to wait longer to receive their goods and expect prices to increase as companies will need to increase delivery rates to meet the requirements of ACF.

We all want clean air but for the reasons above, it is near impossible for drayage companies to comply with the Advanced Clean Fleets rule under the current proposal. We hope the State of California takes all the comments into consideration before making a decision on such a radical regulation that puts a lot of burden on the trucking community.