Clerk of the Board,

It makes no sense for the proposed Advanced Clean Fleets regulation to go forward at this time for several obvious reasons.

**Applicability:** The medium and heavy-duty trucks (Class 6-8), we operate require PTO drive units that are connected to the engine/transmissions. These PTO units power hydraulic pumps, air compressors, and truck mounted cranes. Currently, there is no ZEV that has a solution for this requirement. Our class 4-5 trucks that we use for transporting supplies and small equipment to and from our job sites may be required to travel up to 300-400 miles on any given day. Currently there is no ZEV available to meet that requirement.

**Infrastructure:** Our jobsites do not have power available so setting up charging stations on site is not possible. Some of our medium duty mechanic trucks are driven home by employees the vehicles are assigned to, and it is infeasible to install ZEV charging stations at each person’s home, and we cannot ask them to personally bear the cost of charging a truck overnight.

**Cost:** Since the current on-road regulation has been in effect, we have implemented a turnover plan and purchased 40 new trucks to remain in compliance. Now, we are being asked to begin purchasing new, more expensive trucks that currently do not exist for our application.

The ZEV market is growing, but it is not ready to meet every application in this industry, and the timing of this regulation is poorly thought out considering companies are still trying to recover from the effects of the pandemic, and we are headed into an economic downturn. This proposed regulation needs to be paused at least until the applications and infrastructure issues have been worked out.

Thank you

James Gonzalez

Fleet Manager

Independent Construction Co.