



October 17, 2022

SUBMITTED ELECTRONICALLY

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

Re: Comments on the Proposed Advanced Clean Fleets Regulation

To the members of the California Air Resources Board:

The California Alliance for Jobs (Alliance) and the Rebuild SoCal Partnership (Partnership) appreciate the opportunity to comment on the proposed regulatory package for the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) rule.

The Alliance represents over 2,000 heavy construction companies and 80,000 union construction workers from Bakersfield to the Oregon border. The Alliance is a unique labor-management partnership that advocates for responsible investments in public infrastructure projects. Specifically, the Alliance keeps California's people and economy moving as the state's population grows by focusing on improving water systems, expanding transportation networks, and increasing the access and quality of our public infrastructure. Ultimately, smart infrastructure investments are the backbone of California's long-term success; ensuring future generations have sustainable economic prosperity and an enhanced quality of life. The Alliance is proud to support our members' mission to build and maintain California's most vital infrastructure.

The Partnership consists of 2,750 contractors throughout Southern California that represent more than 90,000 union workers in all 12 Southern California counties. Based in Anaheim, California – the Partnership is dedicated to working with elected officials and educating the public in Southern California on the continued need for infrastructure funding and to enhance the regions' workforce development while creating career construction jobs. The Partnership is dedicated to advocating for clean water, safe bridges and roads, which are vital to Southern California's economy. A well-designed and maintained infrastructure is essential to our quality of life. With a primary focus on Southern California projects, the Rebuild SoCal Partnership and our community advocates for responsible investment in public infrastructure projects to help fix our aging public systems, while building for our future needs and economic growth.

After reviewing the proposed ACF, we are concerned that the proposal will not only have significant negative impacts to our members whose businesses utilize the medium- and heavy-duty trucking fleets the ACF directly regulates but will also have far reaching detrimental impacts on the state's critically important infrastructure and goods movement systems. For the reasons outlined below, the Alliance and Partnership believe the proposed ACF must be subjected to

further scrutiny, additional policy discussions with stakeholders should be carried out, and major modifications completed in order to have a final rule that takes into account real world challenges including the current global supply chain issue confronting manufacturers of electric vehicles, an electric grid and infrastructure that has yet to be built to meet the anticipated demands created by the proposed rule, and the funding challenges that will be imposed on both private and public sector entities in the process of achieving ACF mandates.

We find it hard to believe that moving forward in such a rigid way as proposed by CARB staff that is not based on real-world conditions and fails to take into full consideration the technological and resource challenges, will have devastating consequences to the California economy. We urge the Board to take the opportunity of the upcoming October 27, 2022, hearing to inform staff that more time is needed in the development of the proposed ACF and that additional follow-up with stakeholders is critical if CARB is to eventually approve an ACF that is not only science-based, but technologically achievable and cost effective.

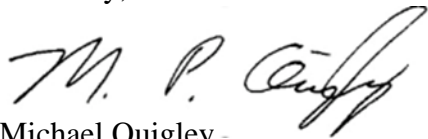
Specific concerns the Alliance and the Partnership have with the proposed ACF includes the following:

- California, the United States, and the World are facing incredible economic and social issues that could not have been contemplated at the start of the ACF proceedings. However, due to the new reality we are facing dealing with procurement, production and supply chain issues impacting availability of EV vehicles proposed to be regulated under this rule, inflation/recession, and the current state of California's electrical grid, we believe the Board should direct staff to incorporate these issues into the ACF and to make sure there is a clear plan to effectively implement the ACF based on these new world realities.
- Our members are experiencing first-hand the lack of vehicles available for procurement that would even come close to the proposed ZEV development trajectory proposed by Board staff. The myriad amount of configurations, sizes, specialty vehicles for medium- and heavy-duty ZEVs will not be available to meet the necessary operations for their fleets' in the timelines required within this package. Based on our member's experiences alone, we strongly recommend that the Board reconsider the proposed definition of "commercially available" if the ACF rule has any chance of proper and effective implementation. Furthermore, in addition to the lack of ZEV availability, the proposed ACF fails to consider / provide direction relative to private and public entities having to operate dual fleets (ICE / ZEV) throughout the process of transitioning to 100 percent ZEVs. With the lack of available ZEV vehicles and unpredictability in ZEV technology coupled with the challenges of constructing / operating dual fueling systems, private and public entities will experience significant planning and funding challenges in their attempt to achieve ACF mandates.
- The ACF ISOR does not adequately address the overwhelming challenges facing the state in making sure there is an electrical grid adequate to support the demands that will be created by the ACF. We believe it is critical that the proposed rule be modified that links the real world issue of electrical grid readiness to whatever regulatory requirements are approved as part of the ACF.

As stated previously, the Alliance and Partnership believe that additional time is needed to adequately discuss and address the issues we have raised as well as issues raised by other stakeholders that share similar concerns. **To that end, we respectfully request the Board ensure that there will be at least one more 45-day rule proposal** to ensure additional public discussion on the draft ACF with the hope that the final product will be able to align the many competing demands across California's transportation, energy, and goods movement systems.

Thank you for considering our comments and we look forward to future conversations on this and other important policy issues.

Sincerely,

A handwritten signature in black ink, appearing to read "M. P. Quigley".

Michael Quigley -
Executive Director
California Alliance for Jobs

A handwritten signature in black ink, appearing to read "Jon Switalski".

Jon Switalski
Executive Director
Rebuild SoCal Partnership