



Brady SoCal, Inc.

October 17, 2022

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

Subject: The Advanced Clean Fleets Regulation Public Hearing on October 27th, 2022
Written Comments for the Record.

The California Air Resources Board (CARB) staff is planning to bring before the Governing Board a proposed regulation titled "The Advanced Clean Fleets Regulation" (ACF). This proposed regulation will require the replacement of all diesel, gasoline, and natural gas vehicles with greater than 8,500-pound Gross Vehicle Weight Rating, with electric vehicles for all public fleets (federal, state, local, school districts etc.), and for high priority private fleets with 50 vehicles or more or annual revenues of \$50 million or more in annual revenues. This phase out of diesel, gasoline and natural gas vehicles out will start with mandates as early as 2025.

We request that the Governing Board of CARB delay the decision on this far-reaching legislative proposal which will potentially do irreparable damage to our California economy, the trucking industry, construction industry, agriculture, and the truck rental industry.

The following issues need to be addressed by CARB before any decisions can be made on the proposed ACF regulation.

We ask CARB to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state, and federal fleets) can and cannot feasibly manage the transition being proposed.

We request CARB engage with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that

outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations. Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations.

We request that CARB prepare an environmental impact report required under CEQA for the estimated 500,000 new high voltage charging stations that must be in place to make this new proposed mandate feasible.

A handwritten signature in black ink, appearing to read "Rick Marshall". The signature is fluid and cursive, with the first name "Rick" and last name "Marshall" clearly distinguishable.

Rick Marshall. President