October 17th, 2022

**Clerk of the Board**

**California Air Resources Board**

**1001 I Street, Sacramento, California 95814**

**RE: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation**

As the third generation owner of a local business on the Central Coast of California, that has been in business since 1933, that has a fourth generation coming up to take over the ownership of the company I can not stand by and not speak up as to the harm that the Advanced Clean Fuels rule would have on our family business. With over 65 full time employees, who’s future employment depends on our ability to purchase and deliver fuel to Government Agencies, Agriculture, Emergency Services, as well as the transportation industry.

JB Dewar Inc. respectfully opposes the adoption of the Advanced Clean Fleets rule as it attempts to transition the transportation and goods movement economy much too quickly without sufficient regard for the necessary infrastructure overhaul in the state, a realistic consideration of the state’s power grid capabilities, and the lack of an adequate and accurate cost analysis.

The regulation’s proposed timeline will place significant strain on the transportation industry and gravely hamper goods movement in the state. Additionally, the cost of replacing fleets with entirely zero emissions vehicles will unduly harm small businesses in the state, many of which are family- and minority-owned. With the limited supply and options for heavy duty ZEVs, large companies with greater capital will be prioritized by manufacturers as compared to their small business counterparts. The highly restrictive timeline will only serve to further exacerbate this problem in the market.

JB Dewar Inc. also has significant concerns because the regulation does not sufficiently consider the current and future needs of the transportation industry within the state. The range of the vehicles that are currently offered on the market will not ensure a seamless transition, as many heavy duty vehicles are often used nearly continuously to ensure the timely delivery of goods to other businesses and consumers. Moreover, the infrastructure necessary to support a full transition to zero emission fleets is not prevalent enough to serve the vast number of vehicles CARB intends to replace. This regulation will be a major disruptor to the state’s supply chains, which will increase the cost of goods at every level, and negatively impact our most vulnerable communities and residents the most.

For these reasons, we must respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,

Ken Dewar

Ken Dewar

President