

# State Building and Construction Trades Council of California

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*Established 1901*  
*Chartered by*  
BUILDING AND CONSTRUCTION TRADES  
DEPARTMENT  
AFL - CIO

October 27, 2022

State of California Air Resources Board (CARB)

Liane M. Randolph, Chair

Sandra Berg, Vice Chair

1001 I St #2828,

Sacramento, CA 95814

## **RE: Proposed Advanced Clean Fleets (ACF) Regulations**

Dear Madam Chair, Madam Vice Chair and fellow CARB Members,

The State Building and Construction Trades Council, AFL-CIO, represents nearly 500,000 working men and women in the construction industry, including 73,000 currently enrolled in our state-of-the-art apprenticeship programs across the state. Our members live in every community in California. They are subject to California's forest fires, blackouts, droughts, and flooding, making them keenly aware of the need for common-sense solutions and actions to address the climate crisis. We appreciate the opportunity to respond to the proposed ACF regulations. While we support the goals of the regulations to reduce carbon emissions and bolster technologies that will allow us to safely meet air quality standards and greenhouse gas reduction goals, we strongly caution against a regressive approach that restricts California's response to the climate crisis to a single technology.

As we've stated in previous comments around proposed CARB regulations, increases to California's electric consumption without a corresponding commitment to new power generation will only further strain California's electric grid, putting Californians at risk of more rolling blackouts and grid failures. When Texas dealt with supply problems during a hard freeze in 2021, it led to the loss of life, interruption of commerce and billions of dollars of damage. Just recently, the Building Trades worked with Governor Newsom to bring five previously and prematurely decommissioned gas-fired power plants back online to ensure that vulnerable Californians were protected during periods of peak demand.

The proposed ACF regulation would require state and local government fleets, drayage trucks, high priority fleets, and federal fleets to phase in medium- and heavy- duty ZEVs. The proposed ACF regulation and the Advanced Clean Trucks (ACT) regulation are expected to result in a significant bump of ZEVs – 510,000, 1,230,000, and 1,590,000 ZEVs in 2035, 2045, and 2050.<sup>1</sup> We urge CARB to work to ensure that ZEV deployment and related infrastructure build-out schedules are “technologically feasible, cost-effective, and support market conditions,” and

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<sup>1</sup> The California Air Resources Board, Public Hearing to Consider the proposed Advanced Clean Fleets Regulation, Staff Report: Initial Statement of Reasons

include considerations as to whether the criteria emission reductions can be met with the proposed phase-in schedule without risking public health and safety.

To help the state meet its decarbonization and air quality targets, we urge you to ensure any proposed regulations provide parity for the use of Battery Electric Vehicles (BEVs), Plug-in Hybrid Electric Vehicles (PHEVs), Fuel Cell Electric Vehicles (FCEVs), and other forms of technologies capable of utilizing low or below zero carbon fuels for the state's growing transportation sector. We also request flexibility in the proposed regulations so that addition of a new or used Near Zero Emission Vehicle (NZEV) may optionally be made in lieu of ZEV without a sunset. Hydrogen, clean diesel, and natural gas each provide new means to reduce emissions and power the state with more energy options. Several refineries in both Northern and Southern California are already converting to producing new fuels. These refineries will continue to employ our members, and our brothers and sisters in the United Steelworkers. We must diversify our fueling portfolio to ensure the state can produce enough energy in a climate responsible way to power our existing and increased future needs.

Lastly, as California works towards accelerated deployment of ZEVs, we strongly believe an equally accelerated deployment in fueling and charging infrastructure is crucial. Building and improving the public fueling and charging infrastructure is critical to sustaining and growing strong middle-class jobs. By prioritizing this approach, California can create tens of thousands of opportunities for women and men in the construction trades while simultaneously creating a network of fueling options that makes broad deployment of reduced emission vehicles a reality.

We urge CARB to continue working with us to ensure that California can meet established climate goals realistically while supporting the needs of workers, communities, and the economy while we embark on this transition. Thank you for your time and consideration.

Sincerely,



ANDREW J. MEREDITH

President

State Building & Construction Trades Council  
of California

cc: Rajinder Sahota, Deputy Executive Officer- Climate Change and Research