



March 27, 2023

Chairperson Liane M. Randolph and Members of the Board
California Air Resources Board
1001 "I" Street
Sacramento CA 95814
arbboard@arb.ca.gov

Coalition Members



Associated General Contractors
America-San Diego Chapter, Inc.



Building Industry Association
of Southern California



California Construction Trucking
Association



Engineering
Contractors Association



United Contractors



Southern California
Contractors Association

RE: Advanced Clean Fleets Rule negatively impacts Construction Fleets

Dear Chairperson Randolph and Members of the Board:

The construction Industry is deeply concerned about the impacts of the latest version of the Advanced Clean Fleets regulation. Attached are three previous letters which we have submitted to the staff during the development of this regulation which have been largely ignored.

Construction on-road fleets are generally specialty equipment that does not fit the profile of those easiest to transition to zero emission based on the data developed by your "Large Entity Reporting" rule. That profile was based on fleets largely doing light duty work, dispatched locally, traveling less than 150 miles per day and homed at the same corporate facility every night. That does not describe our trucks!

The construction fleet generally works at remote locations where there is no electricity, let alone charging equipment. These trucks may remain at the site for long periods of time. They are likely not homed at the corporate headquarters when they are moved. And they travel to multiple sites in the course of a day or a week, none of which are likely to have charging available. Further these trucks are likely to have heavy maintenance equipment on board (welders, compressors, and lifts) that require power from the truck or additional PTO units. Weight becomes an important factor.

Our equipment simply does not belong in this first wave of trucks to be transitioned to zero emissions.

We would like the opportunity to discuss with you directly our concerns and language that should be added to the regulation to address our concerns. We will make time available whenever is convenient for you.

Thank you,
Sincerely,

Michael Lewis
Senior Vice President

