

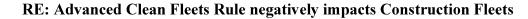
AIR QUALITY COALITION

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

Dear Chairperson Randolph and Members of the Board:

Coalition Members





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.



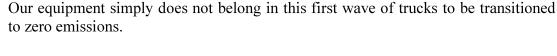
Associated General Contractors America-San Diego Chapter, Inc. Construction on-road fleets are generally specialty equipment that does not fit the profile of those easiest to transition to zero emission based on the data developed by your "Large Entity Reporting" rule. That profile was based on fleets 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!



Building Industry Association of Southern California



California Construction Trucking Association 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.



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.



Contractors Association



United Contractors

Southern California

Contractors Association

Sincerely,

Thank you,

Michael Lewis Senior Vice President

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