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Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

*Via Electronic Submittal at*

[https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=act2019&comm\\_period=A](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=act2019&comm_period=A)

**SUBJECT: Comments on the Proposed Advanced Clean Trucks Regulation — Accelerated ZEV compliance and large entity reporting**

Far West Equipment Dealers Association representing equipment dealers throughout California renews concerns previously submitted (Nov. 15, 2019) about proposed changes to the Advanced Clean Trucks draft regulation set for hearing before the California Air Resources Board (CARB) on June 25, 2019. While FWEDA supports efforts to improve air quality and the health and well-being of our citizens, this draft regulation imposes costly and burdensome compliance and reporting requirements for businesses.

There is a disconnect between the stated objectives of the regulation and its proposed application. While it states it applies to fleets, objectives in ongoing presentations and assessments speak directly to targeting ZEV replacements for the 1.04 million Class 2b-3 vehicles on California's roads. (Slide 7, Dec. 12, 2019, CARB presentation.)

In today's staff presentation, it was acknowledged that the Engine Manufacturers Association proposal shows this class of vehicle is not realistic for the scale and timing of these replacements. Staff stated the EMA proposal would not be incorporated into its plans.

Following release of the proposed changes to large-entity reporting per stakeholder concerns as contained the Dec. 12, 2020, today's presentation lowered the reporting requirements from 100 to 50 vehicles, adding back a considerable number of businesses that will now be forced to report. This last-minute maneuver blindsides businesses that will experience the greatest effects of this regulation without sufficient time to assess the impacts before the board approves the regulation as staff requests today. Additionally, the reporting requirement duplicates existing processes already in place, adding unnecessary bureaucracy businesses must navigate and pay for:  
[https://ww3.arb.ca.gov/msprog/truckstop/pdfs/sb1\\_faqeng.pdf](https://ww3.arb.ca.gov/msprog/truckstop/pdfs/sb1_faqeng.pdf)  
<https://ww3.arb.ca.gov/msprog/truckstop/truckstop.htm>,

CARB ACT Rule revisions removing the pickup exemption and proposing acceleration of ZEVs by 2024 (<https://www.truckinginfo.com/357198/carb-proposes-more-stringent-rules-for-electric-trucks-in-calif>) is unrealistic and will be costly for businesses already reeling from COVID-19 impacts and increased compliance in other areas of their businesses, which include but are not limited to increased OSHA health and safety compliance due to COVID-19 and [Net-Zero commercial building compliance](#) by 2030.

**CARB:** “As a result of the increased requirements found in the Proposed Modifications, staff anticipates that a portion of the manufacturers’ sales in the Class 2b-3 vehicle group will be to individuals rather than fleets. The assumptions staff made for Class 2b-3 vehicles in the Original Proposal’s staff report are not applicable for individuals; therefore, Class 2b-3 ZEVs sold to individuals are modelled separately with modified assumptions.” <https://ww3.arb.ca.gov/regact/2019/act2019/30dayattc.pdf>

**Gross Vehicle Weight Rating:** <https://afdc.energy.gov/data/10381>  
<https://afdc.energy.gov/data/10380>

Examples of these vehicles include:

Ford: <https://media.ford.com/content/dam/fordmedia/North%20America/US/product/2020/f-series-super-duty/2020-Super-Duty-Tech-Specs.pdf>

GMC: [https://www.gmc.com/content/dam/gmc/na/us/english/index/about/trailer-towing/02-pdfs/GMTB20CT300\\_2020\\_GMC\\_Trailer%20Guide.pdf](https://www.gmc.com/content/dam/gmc/na/us/english/index/about/trailer-towing/02-pdfs/GMTB20CT300_2020_GMC_Trailer%20Guide.pdf)

Dodge: <https://www.ramtrucks.com/towing-guide.html>

***This change goes far beyond the stated goal of vehicle fleets and encompasses all Class 2b-3 vehicles.***

**CARB 15-day notice:** “In recent months since the Notice and Staff Report were released, manufacturers have made numerous announcements regarding zero-emission pickup trucks. These include Tesla unveiling their medium-duty Cybertruck in November 2019, Nikola announcing the Nikola Badger, a pickup available as either battery-electric or fuel cell electric, and General Motors announcing a battery-electric Hummer (Tesla, 2019; Nikola, 2020; GMC, 2020). These announcements are in addition to previous electric pickup announcements from Ford, Rivian, and Bollinger Motors. Some of these are in the Class 2b-3 category and some are light duty.”

From industry leader Car and Driver, the earliest “could be” 2021:

<https://www.caranddriver.com/news/a28947992/electric-ford-f-150-2021-planned/>

<https://www.theverge.com/2019/11/21/20975475/tesla-cybertruck-announcement-musk-electric-truck-pickup-features-range-price-release-date>

***Ramping up compliance given that zero-emissions models won’t even hit the market until maybe a year or two before the requirement takes effect leaves little opportunity for cost consideration in planning vehicle and fleet replacements. Based on the market reporting, these ZEV models may not even be suitable fuel-engine replacements for fleet use. Estimated costs of suitable replacements (Tesla’s 500-mile, \$70K) are prohibitive and do not reflect assumptions in CARB’s market assessment.***

CARB’s own reporting shows the highest use Class 2b-3 is the least suitable for this aggressive replacement approach: <https://ww3.arb.ca.gov/regact/2019/act2019/appe.pdf>

And despite this aggressive approach to replacing Class 2b-3 vehicles with ZEV, CARB's Total Cost of Ownership assessment doesn't even address this vehicle class:

<https://ww3.arb.ca.gov/regact/2019/act2019/apph.pdf>

***Coupled with reducing the reporting threshold to 50 vehicles, this oversight means there is no consideration for this targeted class, which represents the greatest financial impact to businesses and consumers.***

#### **BUSINESSES & TAXPAYERS BEAR BRUNT OF COSTS**

CARB: "Fueling infrastructure and maintenance — In the Staff Report, staff assumed a Class 2b-3 ZEVs would need a 19.2 kW Level 2 charger costing \$5,000, infrastructure upgrades costing \$20,000, and on-going charger maintenance of \$500 per charger per year. These costs reflect a scenario where a larger fleet needs to install multiply chargers in a parking lot and will need to trench through asphalt, upgrade switchgear and lay conduit. Individuals or very small businesses would be expected to install Level 2 chargers in or near their garage with lower costs. In the Updated Proposal, staff assumes a Class 2b-3 ZEV sold to an individual will spend \$500 for charger, \$1,250 for installation, and \$5 per year for maintenance (Avista, 2019). These costs are not amortized."

#### **INFRASTRUCTURE DEFICIENCIES:**

<https://ww2.arb.ca.gov/resources/documents/battery-electric-truck-and-bus-charging-cost-calculator>

Despite the considerable impact CARB's aggressive approach to adding ZEV's to the power grid will have, there is no assessment of this impact in the regulatory documents. Volvo's representative today emphasized the infrastructure and market deficiencies that are obstacles to successful development and implementation of this proposal.

**COST & BENEFIT ANALYSIS IS MISLEADING:** Infrastructure and electric utility costs require an independent review and deeper analysis for ACT Rule impact on businesses and consumers who will pay for this, according to the assessment. This is particularly true for rural areas where infrastructure and charging stations are more difficult and costly to install and maintain.

Far West supports EMA's recommendations to tie mandates to sales and to delay the implementation to improve the chances of successful fuel-engine replacements with ZEV. We urge the CARB board to reconsider its aggressive approach to implementing the ACT Rule and reporting requirements as this far-reaching regulation will have significant financial consequences for businesses and consumers.

Respectfully,



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President & CEO