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10/7/22

**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**

**I am writing to you on behalf of McNeece Bros. We are a wholesale / retail energy and logistics company operating in Imperial County. We supply fuels, lubricants, greases, and DEF to our wonderful customers. We take great pride in our work and service to the large agriculture area here in Imperial as we know we are an integral part of their industry to assist them in their work of feeding the planet. We employ 70 employees with high wage jobs and profit sharing plans because we valjue our employees tremendously and consider them family. We offer these good quality jobs in a county that has the highest unemployment rate in the nation.**

**McNeece Bros.** 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 that has been proposed will only serve to further exacerbate this problem in the market.

Additionally, significantly increasing the operating costs of the transportation and goods movement sector within the state will ultimately harm our most vulnerable communities and residents the most. Low-income households in the state are already bearing the brunt of increased electricity costs,[[1]](#footnote-1) which will only be further intensified by the adoption of this regulation as our unreliable grid continues to be strained beyond capacity. As a small business who takes great pride in serving our community, the impacts of the proposed regulation on the costs of goods and necessities, such as food, water, and fuel, are of grave concern.

**McNeece Bros** 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.

We urge the Board to consider the deeply unsettling ramifications of bottlenecks in our fuel, food, water, and medical supplies, in addition to every industry that moves goods on heavy duty vehicles within the state.

Regulations like the ones currently proposed will put my 4 generational family business out of business. This will in turn result in the local agricultural community without companies like mine who would be able to serve their needs. Not having these goods and services will result in them not being able to accomplish their work and goals of helping feed the planet. This will also result in the loss of 70 high quality jobs in a county that already extremely lack high quality jobs in an area that is notorious for having the highest unemployment rate in the county.

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

Sincerely,

**Patrick McNeece**

**Operations Manager**

**McNeece Bros. Oil Co. Inc.**

1. <https://www.next10.org/publications/electricity-rates-2> [↑](#footnote-ref-1)