



California Fuels and Convenience Alliance

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**Clerk of the Board
California Air Resources Board
1001 I Street, Sacramento, California 95814**

RE: Proposed Modifications to the Advanced Clean Fleets Regulation

The California Fuels and Convenience Alliance (CFCA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and more than one half of the state's 12,000 convenience retailers. Our members are small, family- and minority-owned businesses that provide services to nearly every family in California. Additionally, CFCA members fuel local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among many others.

CFCA continues to oppose the adoption of the Advanced Clean Fleets rule as modified because the modifications fail to address:

- The scarce availability and unsatisfactory capabilities of existing heavy-duty electric vehicles
- The lack of sufficient charging infrastructure and grid capabilities across the state
- The pervasive permitting issues of electrifying infrastructure projects

CFCA urges CARB to consider alternative potential solutions to reduce the transportation sector's carbon intensity, which includes renewable liquid fuels and renewable compressed natural gas, that provide immediate and significant reductions in emissions.

Vehicle Availability and Capabilities

Despite the requirements for manufacturers to sell ZEVs in all vehicle classes, if the Board does not include a realistic timeline for vehicle adoption, the State's critical supply chains will undoubtedly be bottlenecked until they break. Bottlenecks, and resulting shortages, in the State's supply of food, fuel, water, and medical supplies presents profound ramifications for the wellbeing of every California resident. This will be especially detrimental to our small businesses in the State, who will struggle to find new vehicles and parts when competing with large companies who have more buying power.

The transportation sector has already had to grapple with immense struggles in maintaining a consistent supply chain throughout the State. This has left many businesses with large backlogs of critically needed equipment, uncertainty surrounding the delivery of goods to stock their shelves, and artificially created shortages as a result of panic buying by consumers. The proposed regulation as modified will further fray an already failing supply chain, which is heavily reliant upon the trucking industry as the backbone of our State's economy.

Additionally, the vehicles currently offered by manufacturers do not have sufficient range to serve the needs of the transportation industry. Heavy-duty vehicles are often used nearly continuously to ensure goods are delivered on time to serve other businesses and consumers; the current vehicle offerings cannot accomplish the tasks performed by existing internal combustion engine vehicles.

Moreover, further exemptions for particular use cases should be considered by the Board to protect all drivers on the road. ZEV heavy-duty trucks transporting fuels presents risks that are unquantifiable in nature should collisions occur on the road.

Finally, CARB's aggressive mandates for "zero emission" vehicles only accounts for electric vehicles' tailpipe emissions without proper consideration of the emissions produced from manufacturing these vehicles. The mining necessary to extract the extensive amounts of lithium and cobalt needed to produce heavy-duty electric vehicles generates significant emissions and will leave lasting scars on our environment. This deserves to be accounted for in an honest environmental impact report of this regulation.

Lack of Infrastructure and Grid Capabilities

As we have seen in the last few months, California's grid during extreme weather, such as atmospheric rivers, is unable to serve customers' current needs. Heavy-duty ZEVs require an incredible amount of electricity to charge, electricity California utility companies cannot guarantee. This regulation will further strain our grid, which has consistently proven to be unreliable and will only accelerate its decline when stressed by the charging needs of heavy-duty vehicles.

Like light-duty vehicle charging, heavy-duty vehicle charging infrastructure is not prevalent enough to serve the vast number of vehicles CARB intends to replace with ZEVs. Heavy-duty vehicles require a large amount of power to make timely deliveries, these needs are currently being met by renewable diesel and biodiesel products in use today. The timelines mandated by the Board will not allow for infrastructure to keep up with the artificial demand of ZEVs being created by this regulation.

If companies are forced to transition to ZEVs without sufficient electric charging or hydrogen fueling infrastructure, CARB will cause another layer of transportation difficulties. The past few years have seen new challenges with driver shortages, parts and maintenance struggles, and ever-increasing compliance costs, further stressing the goods movement industry at this time is irresponsible and will contribute to higher costs of living in California.

Additionally, we urge the Board to address the ubiquitous parking shortages that already exist for the heavy-duty sector. This critical issue will only be further intensified by the extended charging times of electric heavy-duty trucks. This is especially concerning for trucks that do not perform an “out-and-back” route.

CFCA appreciates the Board’s consideration for extensions, however, the extensions necessitate onerous and detailed applications from our small business owners that is of grave concern. Instead of requiring this extensive reporting from vehicle owners, the Board should require municipalities, contractors, and utilities to submit the reports.

Local permitting

When presenting these electrical infrastructure projects, local planners too often add hundreds of thousands of dollars in site upgrades. Without a compressive review of all local ordinances and requirements, it is impossible to determine what the fully realized cost of electrification will be. We request that the real cost and timeline approval for all municipalities be made available to achieve the Advanced Clean Fleets requirements.

Further, utility companies are taking advantage of the increased power needs for ZEV vehicles by attempting to tie project approval for ZEV infrastructure to power distribution upgrades, large scale power line undergrounding, and other projects that should be paid for through the normal business operations of these utility companies. Further increasing the difficulty and timeline of complying with ARB transportation strategies and adding external costs only harms ARB’s vision of clean transportation.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Alessandra Magnasco". The signature is fluid and cursive, with a large initial "A" and "M".

Alessandra Magnasco
Policy Manager
California Fuels and Convenience Alliance