
From: tom@goldenstatefreight.com
Sent: Thursday, October 6, 2022 2:49 PM
To: ARB Clerk of the Board
Subject: ACF Regulation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear ARB: Although all of us Californians would like clean air; your proposed ACF Regulation is not feasible for a multitude of reasons. Please review the reasons/concerns below and provide remedies/answers for such concerns. Under proposed ACF regulation California would make itself an uncompetitive, isolated state in The Union that Industries that are able, will in fact avoid during business in CA; resulting in lost revenue to the State.

- 1) ACF regulation will cause supply chain issues that will cause extreme, irreversible damage to the State's economy. Freight and industry will be diverted away from CA.
- 2) Lack of electrical and charging infrastructure. There is currently little to no charging infrastructure for zero emission trucks in the State. Who's going to pay for power grid updates needed ? Certainly not PG & E and doubt the State will pay for the grid upgrades; therefore, the consumers will ended up paying for your ACF regulation.
- 3) Zero emission trucks are on the average 12,000 lbs. heavier than conventional trucks (30% less payload); therefore, unless the State & Federal governments increase maximum allowable weight limits for truck/trailers by 12,000 lbs., the Shipping industry is looking at freight rates increases, even if freight rates remained the same. Speaking of freight rates; what do you think freight rates in CA will have to do to support expensive zero emission truck and charging station purchases ?
- 4) Speaking of charging stations; do you realize that zero emission trucks cannot make the trip to and from the Central Valley, the nation's and world's food basket, and CA Ports without charging ? Charges take 6 hours on average; thus, an increase to costs of doing business in California; not to mention being very inefficient.
- 5) If you are going to enact proposed ACF regulation, the State of California should therefore enact laws to the shipping public requiring Shippers and Receivers in the State to provide charging stations at their facilities. Also; CA should pass legislation requiring the Shipping industry to pay freight rates to support the implementation and operation of zero emission vehicles. Good luck with that !

I'm sure I've missed several other considerations that need to addressed regarding this ill advised ACF Regulation; however, I sure would like answers to the concerns addressed above !

Thank you,

Tom Bair

Golden State Freight, Inc.

Garrison Logistics, Inc.

O:800-803-9633

C:209-505-1430

F:209-526-1904



Mailing Address: PO Box 1440 French Camp, CA 95231

Physical Address: 4236 S. Highway 99 Stockton, CA 95215