



**California Council for Environmental and Economic Balance**

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October 22, 2024

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

Submitted via [Electronic Submittal](#)

RE: CCEEB comments on CARB's Modified Text for the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure.

Chair Randolph and Members of the Board:

On behalf of the California Council for Environmental and Economic Balance (CCEEB), thank you for the opportunity to provide comments on the California Air Resources Board's (CARB's) Modified Text for the Proposed Amendments to the Advanced Clean Trucks Regulation (the Regulation) and the Zero-Emission Powertrain Certification Test Procedure. CCEEB represents both on- and off-road mobile source operators as well as entities producing and delivering electricity, hydrogen fuel, and conventional fuel. As such, CCEEB has been actively participating in the development of the Regulation in the interest of ensuring a just transition to the next phase of California's transportation, goods movement, and energy ecosystem. CCEEB has several concerns to share regarding the Regulation.

**CARB's proposed amendments provide inadequate time for CARB and its Board to review written public comments before the Board Hearing.**

CARB released proposed modifications to the Regulation on October 7, 2024, which is 17 days prior to the scheduled Board hearing on October 24<sup>th</sup>. Since the public may submit written comments up to October 22<sup>nd</sup>, Staff and the Board will only have 1 day to review all of the written public comments before the Hearing. While this timeline may meet the letter of the law, it is simply not enough time for CARB to meaningfully consider input from the public. CCEEB requests that Staff provide more time to consider public comments in the future.



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**CARB did not analyze the potential impacts of allowing secondary vehicle manufacturers to trade, sell, or transfer ZEV and NZEV credits.**

As summarized in item 7 (see below) of CARB's Notice, CARB proposes to allow secondary vehicle manufacturers to trade, sell, or otherwise transfer ZEV and NZEV credits.

*"7. In section 1963.2(e), the language "secondary vehicle manufacturers have the option to trade, sell, or otherwise transfer ZEV and NZEV credits with manufacturers" was added. The proposed change is necessary to allow secondary vehicle manufacturers to participate in the credit banking and trading system of the ACT regulation. Secondary vehicle manufacturers would be provided with a greater ability to procure internal combustion engine vehicles in instances where a manufacturer is restricting sales of these vehicles and choosing not to purchase credits."*

Unfortunately, CARB does not analyze the impact of such a change. CCEEB is concerned that the change could lead to a greater demand for the same number of credits which could lead to increased credit costs and therefore increased truck costs. CARB has a duty to analyze the impacts of this action and be transparent about any potential change to vehicles costs.

Thank you for the consideration of our comments. Please feel free to contact me at [petero@cceeb.org](mailto:petero@cceeb.org) or 925-339-3500 for further information or discussion.

Sincerely,

Peter Okurowski  
Policy Director  
CCEEB