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**From:** JJ Rico <jrico@tigerlines.com>  
**Sent:** Thursday, October 6, 2022 9:03 AM  
**To:** ARB Clerk of the Board  
**Subject:** Fix the ACF (acf2022) - Tiger Lines, LLC

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Dear Clerk of the Board,

Tiger Lines, LLC appreciates the opportunity to comment publicly on the Proposed Advanced Clean Fleets Regulation (ACF).

As a long-time intrastate carrier, the impending ACF regulation is poised to cause harm to our organization and the supply chain at large within California and nationwide. Some of our concerns with the ACF regulation are as follow:

**Technology:** The technology to switch over to fully electric does not currently exist and is not within sight. Class-8 vehicle electric options available and in development are limited and unrealistic in fulfilling the day-to-day duties that current combustion engines fulfill.

**Operating Cost:** Work capacity and mileage range for electric trucks in development are a fraction of internal combustion engines. The procurement of new electric vehicles would double and triple the organization's budget. Parts, tires, and repair are virtually non-existent for electric trucks, constricting operations and the supply chain.

**Infrastructure:** The infrastructure to run and power electric trucks is highly underdeveloped and unreliable for day-to-day use.

**Sustainability:** The sustainability of electric trucks (and cars) is unproven. From a zero-emissions standpoint, electric does little to reduce carbon emissions due to power grids that rely on carbon fuels. Precious metals are being mined at an accelerated rate to manufacture vehicle batteries. The waste byproducts of spent batteries are also highly volatile and toxic to the environment.

We urge you to amend the ACF regulation to help the regulation find more sustainable, eco-friendly emission solutions without constricting the supply chain and, therefore, the quality of life of our citizens.

Thank you,  
Tiger Lines, LLC

Sincerely,

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