



Air Resources Regulatory Experts

December 8, 2019

The Honorable Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street Sacramento, CA 95814

**Re: Comments on the Proposed Advanced Clean Trucks Regulations—Large Entity and Fleet Reporting Requirement**

Dear Chair Nichols:

My office has had the privilege of working on the development of every on-road regulation done by the Board for the past 20 years. I have served on the Board's ACT committee since 2016 and offer the following brief comments with the goal of improving upon the draft regulation before the Board.

- 1. We support the comments submitted by the Solid Waste Association of North America, the California Refuse Recycling Council and South Coast AQMD*

The waste industry and public agencies implemented ARB's first three on-road regulations starting in 2000 and have been key partners in reducing criteria pollutants and climate change emissions. The waste industry considers itself the "A-Team" as we have aggressively implemented ARB mandates, including over \$1 billion in alternative fueled vehicles and infrastructure. That unique position must influence the future fleet purchase requirements policy discussion once the reporting phase is completed.

- 2. The fleet reporting as proposed will not be adequate for a complete economic analysis of future fleet purchase requirements*

State regulations require the Board to conduct both an economic analysis and an environmental review of proposed regulations. Without collecting the data on alternative fuel investments made to date, we believe the Board will not comply with state regulations. As we have fully participated in the ACT workshop process we have not seen our requests reflected in the proposed fleet reporting and ask that the following be included in the Final Regulation: a) Fleets in CARB TRUCRS with CNG/LNG engines should be "restored" by CARB TRUCRS staff; b) Fleets and large entities should be allowed to input the value of CNG, LNG or EV infrastructure already installed; and c) in addition to the requested miles, fleets should be allowed to voluntarily submit fuel consumption data. Finally, we encourage CARB to procure outside software development firms who can achieve a result that is user friendly while meeting the data privacy concerns shared by others. We believe that these improvements will aid in the data collection effort.

I may be reached at (916) 520-6040 Ext 104 with any concerns.

Sincerely,  
Sean Edgar  
Director