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April 7, 2023

SUBMITTED ELECTRONICALLY

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

Re: Comments on the Proposed Advanced Clean Fleets Regulation (15 Day Comment)

To the members of the California Air Resources Board:

The California Building Industry Association (CBIA) appreciates the opportunity to comment on the proposed regulatory package for the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) rule.

CBIA is a statewide trade association representing approximately 3,000 member-companies involved in residential and light commercial construction. CBIA member-companies are responsible for approximately 85% of the new homes built and sold in California each year.

After reviewing the most recent version of the proposed ACF, CBIA is concerned that the proposal will have a direct negative impact on our member's ability to meet the current housing crisis facing California. CBIA members are confronted with problems in securing the necessary electrical hook-ups by electrical utilities for individual units that have already been constructed. We are concerned that the additional strain on the state's electrical grid infrastructure based on the requirements in the proposed ACF will make it that much more difficult to secure future electrical hook-ups which will create delays and unnecessary costs in the delivery of critically needed housing throughout California.

Numerous commentators have highlighted the fact that the proposed regulation does not take into account real world challenges including the current global supply chain issue confronting manufacturers of electric vehicles, an electric grid and infrastructure that has yet to be built to meet the anticipated demands created by the proposed rule, and the funding challenges that will be imposed on both private and public sector entities in the process of achieving ACF mandates. By way of reference, CBIA supports the comments made by the California Construction and Industrial Materials Association.

CBIA believes that as currently drafted, the proposed ACF will be difficult, if not impossible, to implement which will only create an atmosphere of regulatory uncertainty for those businesses directly subjected to the proposed rule. The repercussions of the proposed rule will be felt throughout the entire economic supply chain and will negatively impact housing.

We urge the Board to vote down the proposed ACF regulation at the Air Resources Board's April 27th hearing and continue to work with stakeholders in developing a regulation that will both meet California's climate goals and further provide achievable mandates to those entities subject to the regulation.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan C. Dunmoyer". The signature is fluid and cursive, with the first name "Dan" being the most prominent.

Dan C. Dunmoyer
President and CEO