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

RE: Modifications for the Advanced Clean Fleets Regulation

I am writing on behalf of my family's business, Downs Energy. We are a third generation, family owned and operated petroleum marketing business that services large and small commercial and industrial organizations throughout California. We currently employ roughly 70 employees.

Downs Energy respectfully opposes the adoption of modifications to the Advanced Clean Fleets rule as it continues its attempts to transition the transportation and goods movement economy much too quickly without sufficient regard for the necessary infrastructure overhaul in the state, a realistic consideration of the state's power grid capabilities, and the lack of an adequate and accurate cost analysis.

Modifications to the regulation's proposed timeline still do not address the significant strain on the transportation industry and will continue to gravely hamper goods movement in the state. Additionally, the cost of replacing fleets with entirely zero emissions vehicles will unduly harm small businesses in the state, many of which are family- and minority-owned. With the limited supply and options for heavy duty ZEVs, large companies with greater capital will be prioritized by manufacturers as compared to their small business counterparts. The highly restrictive timeline that continues to be proposed in the modifications will only serve to further exacerbate this problem in the market.

Downs Energy continues to have significant concerns because the regulation's modifications do not sufficiently consider the current and future needs of the transportation industry within the state. The range of vehicles that are currently offered on the market will not ensure a seamless transition, as many heavy-duty vehicles are often used nearly continuously to ensure the timely delivery of goods to other businesses and consumers. Moreover, the infrastructure necessary to support a full transition to zero emission fleets is not prevalent enough to serve the vast number of vehicles CARB intends to replace. This regulation, even as modified, will be a major disruptor to the state's supply chains, which will increase the cost of goods at every level, and negatively impact our most vulnerable communities and residents the most.

Additionally, these regulations will negatively impact our business to the extent that we may not be able to operate, given the majority of our business depends on the need for diesel fuel to which we are a major supplier. Our 85-year legacy, along with our employees' jobs, is now threatened by these continued regulatory strains.

For these reasons, we must continue to respectfully oppose the adoption of the Advanced Clean Fleets rule as modified.

Sincerely,

Michael J. Downs  
President



[fuelthecause.org](http://fuelthecause.org)