



April 7, 2023

Chair Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets Regulation

Dear Chair Randolph and Board Members,

The undersigned organizations appreciate the opportunity to comment on the Advanced Clean Fleets (ACF) regulation. Our coalition, which includes various members of the agricultural community, acknowledge the recent amendments to the ACF and recognize that these updates will help subjected parties better comply with the regulation. However, we'd like this opportunity to express remaining concerns with the overall feasibility of transitioning the medium- and heavy-duty fleets at scale.

Per the recent amendments, the proposed regulation now provides opportunities for various extensions based on infrastructure site electrification delays and construction delays. While we find this necessary, we posit it is likely that more time will be needed after the allotted extension expires. Our members have had several experiences with either the inability of utilities to provide clear infrastructure timelines or construction timelines extended without regard. For example, a member with a simple agricultural shop has been waiting to be connected to service for over 6 years since the initial application, which is over the allotted extension time stated in the proposed regulation. Furthermore, the projected infrastructure and rate costs associated with charging zero-emission vehicles (ZEVs) will burden California's agricultural community and further drive essential operations out of state.

As many Californians experienced power shut-offs due to the extreme heat wave this past summer, we also question whether or not the state's electrical grid will be able to handle the load capacity needed to charge the estimated 532,000 trucks regulated by the ACF.

While we *may* experience long-term savings from retiring our current fleet, they will have no effect on the upfront capital expenses needed to purchase and accommodate ZEVs. Therefore, we ask the California Air Resources Board (CARB) work with the Legislature to appropriate consistent and adequate funding to help aid the transition to ZEVs.

In conclusion, we urge CARB to work with the regulated community to ensure that our concerns are addressed as we move to implement this extreme overhaul of the medium- and heavy-duty fleet. We recognize this regulation is likely to be approved, so at the very least, we suggest CARB evaluate the progress of the ACF and look to extend the extensions or exemptions, as needed.

We thank you for the opportunity to comment and look forward to continuing working with you as we navigate through the transition to ZEVs.

Sincerely,



Richard Matoian, President
American Pistachio Growers



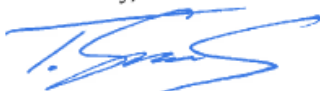
Ian LeMay, President
California Fresh Fruit Association



Terry Gage, President
California Agricultural Aircraft Association



Timothy A. Johnson, President/CEO
California Rice Commission



Todd Sanders, Executive Director
California Apple Commission
California Blueberry Association
California Blueberry Commission
Olive Growers Council of California



Mike Montna, President/CEO
California Tomato Growers Association



Casey Creamer, President
California Citrus Mutual



Robert Verloop, Executive Director/CEO
California Walnut Commission

A handwritten signature in cursive script, reading "Chris Zanobini".

Chris Zanobini, Executive Director
Plant California Alliance

A handwritten signature in cursive script, reading "Renee Pinel".

Renee Pinel, President/CEO
Western Plant Health Association