



Ms. Liane M. Randolph
Governing Board Chair
California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Dear Ms. Randolph,

We have had a number of constituents contact us about the proposed regulation the Air Resources Board staff is planning on bringing before the Governing Board in October that will require the replacement of all diesel, gasoline and natural gas vehicles > 8,500 pound Gross Vehicle Weight Rating with electric vehicles for all state and federal fleets, all public fleets, and for high priority private fleets with 50 vehicles or more or annual revenues of \$50 million or more in annual revenues. We understand the phase out will start with mandates as early as 2025.

The selection of high priority fleets simply on the basis of the number of vehicles or the amount in annual revenues without any distinction on the types of businesses that can feasibly accomplish this endeavor, let alone economically manage the requirement, is concerning. Constituents from the construction, agriculture, and emergency power systems industries have also contacted our offices stating companies that meet the high priority criteria will be forced to replace with electric vehicles leaving those companies at a competitive disadvantage to those fleets that are not private high priority fleets and which are not mandated to replace their vehicles.

Additionally at issue are the heavy duty rental vehicles serving these industries like water trucks and dump trucks. These vehicles have no ability to be charged in remote locations such as highway and construction projects. Additionally, heavy construction and agricultural equipment service vehicles operated by such fleets also have no ability to charge their vehicles remotely. These vehicles will require high voltage DC chargers that are unavailable at remote sites and along the highways in convenient locations.

Also of concern are the costs this will impose on private companies for the charging systems required for these heavy duty vehicles, and the infrastructure to support such systems. Large companies in these businesses with hundreds of vehicles will not have the financial resources to replace so many vehicles while at the same time manage their day to day business. We are also perplexed with the aggressive phase-out this regulation represents when the proper utility infrastructure and DC charger access for heavy duty vehicles in the state is barely existent.

Before the Governing Board approves this regulation that places inequities and financial burden on large private fleets and other fleets in the state, we ask the following of your Board:

1. Letters have been provided to your staff identifying business types such as heavy construction equipment rentals, and heavy construction equipment and critical services maintenance and repair that cannot feasibly replace with electric due to the specialty vehicle type and variability of the day to day vehicle operations. We understand these issues have not been adequately addressed. We ask the Governing Board to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state and federal fleets) can and cannot feasibly manage the transition being proposed.
2. We need real answers to how the tremendous increase in state electrical power will be met to accommodate this proposal. Currently, California is already importing nearly 30 percent of its power needs. This regulation will only increase that demand for daily charging. The utility infrastructure for the needed increases needs to be in place to feasibly manage what is being required of these fleets. We know the Board has been wrestling with the infrastructure issue for automobiles and light duty vehicles and we are greatly concerned when you add the vehicles from these major industries to the list.
3. We need to know the plans for addressing public DC charging stations along the highways and for remote locations. Many EV stations for cars have been installed at convenient locations, but these are not compatible or practical for use with the heavy duty vehicles used in the construction, agricultural, heavy duty rental, and critical services industries. Very little is in place for the required DC charging stations for these heavy duty vehicles, and costs for the chargers and installation is over \$100,000 each, not including the costs for necessary electric utility upgrades. Without the necessary DC charging stations for these vehicles, these industries will be unable to manage necessary construction activities and repair services, and many vehicles and drivers will be unsafely stranded.
4. As all batteries have a limited life, we need to know if plans are identified for the coordination with DTSC and EPA to manage the hazardous waste disposal. A single Class 8 day cab can have up to 15,000 pounds in batteries that will ultimately become hazardous waste.

We look forward to the answers to these questions before the Governing Board moves forward with this regulation.

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