

Comment 1 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Lisa
Last Name: Gonzalez
Email Address: lisa@lahabrafence.com
Affiliation: La Habra Fence Co., Inc.

Subject: S/B 210
Comment:

How is this removed off our vehicle

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-04-17 14:34:58

No Duplicates.

Comment 2 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Andy
Last Name: Schwartz
Email Address: anschwartz@tesla.com
Affiliation: Tesla, Inc.

Subject: Comments on Proposed Amendments to the ACT and ZEP Certification
Comment:

Please find attached the comments of Tesla, Inc. regarding the Proposed Amendments to the ACT Regulation and the ZEP Certification Test Procedures. Should you have any issues accessing the document, please reach out to me using the contact information below.

Andy Schwartz
Senior Managing Policy Advisor
Tesla, Inc.
510-410-0882
anschwartz@tesla.com

Attachment: 'www.arb.ca.gov/lists/com-attach/3-actzepcert2024-UCRSMVclAj0FYglW.pdf'

Original File Name: Tesla Comments on 2024 ACT Revisions_May 2024.pdf

Date and Time Comment Was Submitted: 2024-05-01 09:31:27

No Duplicates.

Comment 3 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Jeffrey
Last Name: Ricker
Email Address: the_dreadnought@yahoo.com
Affiliation:

Subject: Junk Science, Junk Regulations
Comment:

California Air Resources Board

Proposed Amendments to the Advanced Clean Trucks Regulation
and the Zero-Emission Powertrain Certification Test Procedure

Type Of Comment: Individual
E-Mail Address: the_dreadnought@yahoo.com
Submitter : Jeffrey P. Ricker, CFA
Date : 20240507

In this comment set forth below, we will discuss:

1. Anthropogenic CO2 Global Warming is Junk Science.
 - A. Global Warming Data Fraud.
 - B. Proof that Man Made CO2 Has Not Warmed the Earth.
2. What is the Global Temperature Reduction From This Regulation?

Global Warming Alarmists have infested the staff of bloated CARB. And they have been very very busy. CARB has released an abhorrent torrent of costly junk regulations to abate CO2 emissions. A Climate Kraken. These regulations have enormous costs. Benefits are not known. CARB deliberately will not say. CARB will not quantify the global temperature reduction benefit from any of its CO2 regulations. This is why: As you will see, a climate shows the global temperature reduction benefits are infinitesimal.

What we have here is yet another Climate Kraken: "Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure". It is a morass of inane regulations that only an expensive environmental consultant could love. There is nothing whatsoever on how many tonnes of CO2 are abated or the Global Temperature reduction achieved.

Lots of costs. No benefits.

1. Anthropogenic CO2 Global Warming is Junk Science.

A. Global Warming Data Fraud.

Global Warming Alarmists have used lies and doctored data for decades to promote their hidden policy agendas toward income and wealth redistribution.

Global Warming Alarmists perfidy was rampant in the infamous ClimateGate Scandal. Leading global warming climatologists were caught fraudulently doctoring temperature data to increase Global Warming. The United Nations Nobel prize winning Intergovernmental Panel on Climate Change (IPCC) used temperature data from East Anglia University's Keith "Fudge Factor" Briffa who's computer code contained what he called "fudge factors" adding up to 0.75 of a degree to increase the recent temperature data. In addition, climate scientists conspired to expunge the high historic temperatures of the Medieval Warming Period. In the MWP the Earth was so warm that Greenland was actually green. People would see the MWP and say hey, no difference today. Deleting the MWP made the current warming look unique. It is not.

Furthermore, Pennsylvania State University Prof. Michael "Hide the Decline"

Mann fraudulently spliced two temperature data sets. To make them match he raised the lower data set to match the higher data set where they overlapped. This hid a discrepancy which would have showed up as declining temperatures. Prof. Mann was nearly fired for this breach of academic research protocol.

The ClimateGate Scandal showed there is an abundance of man-made global warming data. But not so much man made global warming. Like the made up temperature data, Nobel Prize winner President Obama made up a number when he said "97 percent of climate scientists agree that climate change is real, man-made and dangerous." There is no evidence whatsoever backing up the 97% number.

In fact there are a lot of respected scientists that disagree, and probably many more that silently disagree. What we have here is an Asch conformity syndrome. Pressure from a group leads people to conform, even when they know that the rest of the group is wrong. Pressure is endemic. The academic peer review process has been corrupted. It's a lynch mob. Doubting scientists can't get research grants, can't get their research published, and don't get hired for climate policy jobs. Among academia, these "Climate Deniers" are one cut above a leper with a bell.

B. Proof that Man Made CO2 Has Not Warmed the Earth.

The science is not settled. Blaming man made Carbon Dioxide, CO2 molecules, for The Global Warming Crisis is junk science.

We can agree that the Earth has warmed about +1.0C degree during the Industrial era. We can also agree that CO2 has increased +0.013% from 0.028% of the atmosphere to 0.041% during the Industrial era. However correlation does not prove causality.

CO2 is a tiny trace gas. Envision this: If you are in a room with a 9 ft ceiling and all the gasses were stacked, the pre-industrial CO2 layer would

be as thin as
a credit card. The raised letters on the credit card are as tall
as all the extra
CO2 added during the industrial age. It is this tiny thin layer of
invisible gas
that has got potty mouth Greta Thunberg, Nobel Prize winner Al
Gore, befuddled
Mr. Biden, and all the other Global Warming alarmist's panties in a
bunch. An
invisible layer of gas as thin as the raised letters on a credit
card.

How an infinitesimal +0.013% increase in CO2 can cause a +1.0C
degree increase in the remaining 99.987% of the atmosphere defies
any common sense explanation.

The Global Warming - CO2 gas math is quite simple. And physically
impossible.
The Earth's atmosphere has warmed +1.0C degrees during the
industrial era. The
added CO2 during the industrial era is one part in 7,700 of the
atmosphere.
To heat the atmosphere +1.0C degrees, the added CO2 molecules must
contribute
+1.0C x 7,700 or +7,700C degrees of heat. The surface of the Sun,
93 million
miles away, is 5,700C degrees. It defies common sense, and
physics, that the
Sun's surface heat, at 5,700C degrees, can travel 93 million miles
through space,
and then heat Earth's CO2 molecules hotter than the Sun at 7,700C
degrees.

To make the CO2 heat pencil out, Global Warming Alarmists claim
there is a CO2
greenhouse heat feedback effect which amplifies the Sun's warming,
a gimmick
with the fancy name of "Radiative Forcing". The extra heat is
impossible.
CO2 can't add more heat than it absorbs. CO2 is an inert gas.
There is no
exothermic chemical reaction.

The planet Venus has been hailed by climate scientists as an
example of CO2
caused Global Warming. Yes, Venus is very hot, 460C degrees. But
conditions on
Venus are extreme. The dense atmosphere is 96.5% CO2. Surface air
pressure
is 1,300 Pounds per square inch, equal to 93 Earth atmospheres.
That amounts
to 220,000 times as much CO2 as the Earth. Plus, at 67 million
miles from the
Sun, Venus receives twice the sunlight energy per square meter as
the Earth.
The extreme CO2 density, high pressure, and strong sunlight
conditions combine
to make the Venus CO2 warming effect 4.1 million times greater than
the
Earth's CO2.

Man made CO2 molecules are not the control knob for the Earth's

temperature.

Don't be hornswoggled by Global Warming Alarmists. It's junk science!

2. What is the Global Temperature Reduction From This Regulation?

You gotta wonder who wrote this inscrutable proposed regulation? Answer: Expensive Sacramento lobbyists, expensive accounting and consulting firms eager to get hired to help companies comply, lawyers eager for all the resulting lawsuits, and the nameless faceless Global Warming Alarmists bureaucrats that have infested CARB. Regulations are many pages of dreadful hooey that only a \$450 per hour environmental consultant lawyer could love.

If this thing passes, you gotta feel sorry for the hapless trucking companies, having to comply with yet another onerous inane CARB regulation, frivolously adding costly expense to their thin margin business. Trucking executives reminisce on their halcyon days when there was no such CARB compliance nonsense.

I propose a Simplified Global Warming Disclosure for every CARB Regulation.

Have every CARB CO2 abatement regulation disclose a simple estimate quantifying how much the regulation will reduce CO2 emissions and thereby reduce the Earth's temperature. As Hillary Clinton once said: "What difference does it make?"

While I disagree that man made CO2 has any significant effect on the Earth's temperature, to make the Global Warming Alarmists at CARB happy we will go with it.

With very little effort, without expensive outside advisors, CARB bureaucrats can probably make a ballpark estimate of the end use CO2 emissions abated by each regulation. A good faith ballpark estimate of the number of Metric tonnes of CO2 is all that is needed.

About 2.3 trillion metric tonnes of CO2 has been emitted during the industrial era. The global temperature has increased +1.0C degree. Using this ratio, each regulation's temperature impact can be quantified:

$$\text{EARTH TEMPERATURE IMPACT} = \frac{\text{ABATED END USE CO2 TONNES} \times 1.0\text{C}}{2,300,000,000,000}$$

For the proposed regulation, assume the total CO2 abated is 250 Million Metric Tonnes (MMT). The Earth's global warming temperature decrease from this costly regulation is therefore -0.0001087C degrees.

$$-0.0001087\text{C} = \frac{-250,000,000 \times 1.0\text{C}}{2,300,000,000,000}$$

That's it. Ask yourself, is an infinitesimal -0.0001087C degrees

worth the cost?

If CARB and Global Warming Alarmists are sincerely concerned solely about The Global Warming Crisis, the temperature change tells you all need to know about the benefit from CARB CO2 regulations. Global Warming Alarmists can add up all the regulation temperature changes to quantify the total benefit of CARB CO2 regulations to The Global Warming Crisis.

In summary, what we have here is a rogue unelected agency, infested with Global Warming Alarmists, using a global warming theory tainted with fraudulent junk science, to force feed wasteful Global Warming policies that are a massive deadweight loss on the California economy, costing jobs, costing taxpayers, costing people's lives, and in the instant case, proposing this monstrosity of utterly useless global warming regulations, without quantifying the benefit, if any, toward The Global Warming Crisis.

When we do quantify the benefit, it is infinitesimal -0.0001087C degrees.

Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-07 00:48:45

No Duplicates.

Comment 4 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Vivianna

Last Name: Herrera

Email Address: Gvivianna@ymail.com

Affiliation:

Subject: CARB

Comment:

I support Miller Industries' comments that request that CARB amend the regulation to recognize the importance of the towing and recovery industries to roadway safety, first responders, and protecting industry jobs in California. Please amend the regulations for the safety of all families and the ability to access new, clean-emission vehicles to keep towing and recovery vehicles on the road, reducing overall emissions

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-07 18:38:08

10 Duplicates.

Comment 5 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Kimberly
Last Name: Tyrrel
Email Address: kctyrrel@comcast.net
Affiliation:

Subject: Electric trucks and the whole situation
Comment:

I'm writing to say CA is in no way prepared to handle electric vehicles much less demand the overall trucking business turn electric. It's outrageous to ask the trucking businesses to do so and THERE AREN'T EVEN ENOUGH CHARGING STATIONS FOR CARS. We have an all electric car now and it's extremely stressful when we take the car outside our local community. We have had situations where we drove to more than 5 stations before we found an available and working. We have spent hours looking and then waiting for the car to finish charging. It's time the CA government wake up. Get the infrastructure in place and stop acting like you are doing what the CA citizens want.

More and more citizens see right through the lies.
YOU WORK FOR US!
Start acting like it or we will vote you out.
Kimberly Tyrrel

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-08 16:10:54

No Duplicates.

Comment 6 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Yazan

Last Name: Ammari

Email Address: yammari@ammariautocenter.com

Affiliation:

Subject: Advanced Clean Trucks Regulation

Comment:

Good afternoon,

I have lived in California my entire life. I have worked in towing since I was 16 years old and paid my way through college. I now own 3 different companies across the nation contracted with AAA for emergency roadside service running over 10,000 calls a month, and owning over 100 tow trucks and service units.

I own an electric vehicle myself and would want nothing more to be able to switch and drop my cost of fuel and maintenance; however, this dream is not a reality. Tow trucks need to be able to fuel up quickly (cannot wait an hour at a super charger) need to be able to tow vehicles for long distances (the most advanced truck on the market goes from 600 miles of range to 100 once loaded) This would make the tow truck able to tow 1-2 calls and charge up rather than a conventional diesel/gas truck. This is going to cause extreme delays, and frankly is not financially possible. The amount of employees and trucks you would need to add would make the company negative year over year without ever seeing a profit margin.

Cost, efficiency, time, none of these factors make this goal realistic. I am implore you to please reconsider this and make an exception to allow our already traffic streets and highways the needed emergency roadside they need.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-09 09:17:19

No Duplicates.

Comment 7 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: david

Last Name: flores

Email Address: david.flores111@gmail.com

Affiliation:

Subject: emmission

Comment:

this is not fair for all towing buisness this will put people out of work and will be too expensive to buy a new truck

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-09 10:57:41

No Duplicates.

Comment 8 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Katie
Last Name: Salciccioli
Email Address: ksalcicc@ford.com
Affiliation: Ford

Subject: Comments on the Advanced Clean Trucks Proposed Amendments
Comment:

Please find the attached Ford comments on the proposed amendments to the Advanced Clean Trucks (ACT) regulation and Zero-Emissions Powertrain (ZEP) Certification test procedure. Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/14-actzepcert2024-VzEHbllhUGdSC1Q3.pdf'

Original File Name: Ford Comments on Advanced Clean Trucks Amendment - 13May2024.pdf

Date and Time Comment Was Submitted: 2024-05-12 19:33:36

No Duplicates.

Comment 9 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Paul
Last Name: Miller
Email Address: hcurtis@nescaum.org
Affiliation: NESCAUM

Subject: NESCAUM Comments
Comment:

Find attached comments from the Northeast States for Coordinated Air Use Management (NESCAUM) expressing strong support for adopting the proposed amendments to the Advanced Clean Trucks (ACT) regulation by the California Air Resources Board (CARB).

Attachment: 'www.arb.ca.gov/lists/com-attach/15-actzepcert2024-AG5QMwd1BzcCZVQh.pdf'

Original File Name: nescaum-comments-act-amendments-final-20240509.pdf

Date and Time Comment Was Submitted: 2024-05-13 07:34:20

No Duplicates.

Comment 10 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Timothy
Last Name: French
Email Address: tfrench@clpchicago.com
Affiliation: Truck & Engine Manufacturers Association

Subject: EMA's Comments on CARBs Proposed Amendments to the ACT Reg and ZEP Cert Test Procedure

Comment:

The Truck and Engine Manufacturers Association hereby submits the attached comments regarding the proposal of the California Air Resources Board to amend the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure.

Attachment: 'www.arb.ca.gov/lists/com-attach/16-actzepcert2024-AmdVPIMzAg4HYlc4.pdf'

Original File Name: EMA Comments Re CARBs Proposed Amendments to ACT Reg and ZEP Cert Test Procedure May 13 2024.pdf

Date and Time Comment Was Submitted: 2024-05-13 08:13:36

No Duplicates.

Comment 11 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: JULIE

Last Name: STEWART

Email Address: julie.buddys@gmail.com

Affiliation:

Subject: CARB LAW REGARDING TOW TRUCK COMPLIANCE

Comment:

As the owner of a small towing business, I am dismayed at CARB's new law regarding the low emissions exemption applying to government owned tow company vehicles and excluding privately owned towing vehicles. In as much as the technology does NOT exist to meet the requirements of this new law for tow truck vehicles; it is logical that ALL emergency towing vehicles be exempted, not just government owned towing vehicles. CARB is literally killing an industry that already struggles with very high insurance rates, highest fuel rates in the US, very high payroll costs, and low pay roadside towing and service contract rates. I strongly urge CARB to reconsider their law and amend it to include privately owned towing companies are exempt.
Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 09:19:29

No Duplicates.

Comment 12 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Trent

Last Name: Butzlaff

Email Address: dsrtowman@aol.com

Affiliation: Plaza Towing Inc

Subject: Advanced Clean Trucks "Act"

Comment:

As a 3rd generation towing company servicing eastern Riverside County for over 56 years, Plaza Towing is dependent upon the ability to source new lower emission equipment from a number of California tow equipment suppliers. If an exception is not made under the new ACT bill, not only will the California tow equipment supply industry be financially decimated costing hundreds if not thousands of specialty jobs, California towers who risk there lives' every single day on CA. highways servicing the motoring public will also be financially affected in a already struggling industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 09:24:15

No Duplicates.

Comment 13 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Mark

Last Name: Henley

Email Address: Completetow1@aol.com

Affiliation: California Tow Truck Association

Subject: Classify Tow Trucks as emergency vehicles

Comment:

Tow trucks that help clear the roads in California do not have an exemption for Electric engines. Carb has overlooked that in our industry. The only way to clear accident scenes in California is to have an exemption or be branded Emergency vehicle. As Carb is aware, they do not have the technology as of yet to make an electric engine to support Towing and Recovery efforts. Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 09:58:29

No Duplicates.

Comment 14 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: RICHARD

Last Name: Moreno Sr.

Email Address: eagletow@sbcglobal.net

Affiliation: Towing Industry

Subject: Emergency Response Vehicle Recognition

Comment:

We in the towing industry have complied with all State and Federal laws pertaining to (Clean Air Vehicles) thus far. Those that have not should be weeded out absolutely. We have had several changes throughout the years that have cost us millions of dollars to be compliant under California laws and regulations. Our industry status to continue serving and perform duties for the general public and roadway safety operations is at risk. We should be considered First / Emergency responders at minimal along with recognition that our vehicles should have the same CARB regulations as State and Government vehicles. WE NEED YOUR HELP !!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 10:45:46

No Duplicates.

Comment 15 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzpcert2024) - 45 Day.

First Name: Teddy

Last Name: Coin

Email Address: tcoin@americanautomakers.org

Affiliation: American Automotive Policy Council

Subject: AAPC Comments on Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/24-actzpcert2024-VDVUM1IjUGBSCwhr.pdf'

Original File Name: AAPC Comments to CARB regarding Proposed ACT Amendments - NZEV AER Determination.pdf

Date and Time Comment Was Submitted: 2024-05-13 13:46:53

No Duplicates.

Comment 16 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Andrea

Last Name: Olivarez

Email Address: Mikestowingservice@sbcglobal.net

Affiliation: Business Owner

Subject: Advanced Clean Truck Act

Comment:

Been in the towing business since 1960, my father started the business, I am a 2nd generation tower. I am on the state board of the California Tow Truck Association/Emergency Road Service Coalition of America. I employ 16 employees. I am the 9th oldest contractor for AAA Northern California, Nevada, Utah. We been a AAA contractor since 1964. We will be celebrating 60 years with AAA this year and 64 years in business this year as well. We are a female owned and operated business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 14:41:23

No Duplicates.

Comment 17 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Jeff
Last Name: Foor
Email Address: jeff.foor@stellantis.com
Affiliation: Stellantis

Subject: Stellantis' Comments on CARBs Proposed Amendments to ACT Reg and ZEP Cert Test Procedure
Comment:

See attached comments from Stellantis.

Attachment: 'www.arb.ca.gov/lists/com-attach/26-actzepcert2024-UiFSIFQwUW4GbFc2.pdf'

Original File Name: Stellantis Comments on CARB Proposed Amendments to ACT Reg and ZEP Cert Test Procedure.pdf

Date and Time Comment Was Submitted: 2024-05-13 14:51:26

No Duplicates.

Comment 18 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Greg

Last Name: Hurner

Email Address: greg@hgra.us

Affiliation: Hurner Government Relations and Advocacy

Subject: Comments on behalf of Miller Industries, Inc.

Comment:

Please see the attached comments to preserve California jobs and allow the newest, lowest emission towing and recovery vehicles to remain available in California. This supports lower congestion emissions and roadway safety for the public and first responders.

Attachment: 'www.arb.ca.gov/lists/com-attach/27-actzepcert2024-UzICZ1UgBAhWigJn.pdf'

Original File Name: ACT Regulatory Comments May 13 2024 Miller Industries.pdf

Date and Time Comment Was Submitted: 2024-05-13 15:09:34

No Duplicates.

Comment 19 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Kirk
Last Name: Blackburn
Email Address: lobby@ellisonwilson.com
Affiliation:

Subject: CTTA/ERSCA Proposed Amendments to the ACT Regulation
Comment:

The California Tow Truck Association (CTTA), known nationally as the Emergency Road Service Coalition of America (ERSCA), submits the attached comments on CARB's proposed amendments to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain Certification Test Procedure respectfully requesting an additional amendment to the ACT Regulation to provide relief for towing and recovery vehicles. The proposed amendment, discussed in detail below, will reduce emissions, preserve California based jobs, and increase safety for first responders and the motoring public.

Attachment: 'www.arb.ca.gov/lists/com-attach/28-actzepcert2024-VjVSIAZzVGYDWgZl.pdf'

Original File Name: CTTA CARB ACT Comments.5-13-24.pdf

Date and Time Comment Was Submitted: 2024-05-13 16:58:42

No Duplicates.

Comment 20 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 45 Day.

First Name: Mark
Last Name: Peeples
Email Address: mwill666@yahoo.com
Affiliation:

Subject: Carb,tow trucks
Comment:

Dear Chair Randolph,

In the coming months, new, lowest-emission towing and recovery trucks will no longer be built or sold in California unless CARB amends the Advanced Clean Trucks regulation, as Miller Industries requested.

California's towing and recovery drivers are not just service providers, they are the backbone of our highway public safety system. They ensure motorists' safety around the clock, assist first responders, and clear over 1,200 road accidents and 2,400 mechanical breakdowns daily. Governor Newsom underscored their importance during the COVID-19 pandemic when they were recognized as part of California's "Essential Critical Infrastructure Workforce."

When the California Air Resource Board (CARB) enacted the Advanced Clean Truck (ACT) regulation, the board recognized that truck manufacturers had not developed electric engine alternatives that meet an emergency service vehicle's range, performance, and safety standards. So, CARB exempted emergency vehicles such as police and fire vehicles, including government-owned towing and recovery vehicles - but not towing and recovery trucks operated by private businesses.

The unintended consequences of the current regulation are becoming increasingly apparent. In the coming months, the production and sales of towing and recovery vehicles will grind to a halt, with existing inventories rapidly depleting. This is leading to a paradoxical situation where towing services are barred from acquiring new, lower-emission chassis assembled in California, while used, higher-emission trucks can be imported from out-of-state. The result is a loss of jobs and increased emissions, which could be avoided with a simple exemption, even if temporary.

At a time when California is facing the country's highest unemployment rate, we need a solution that exempts ALL towing and recovery trucks from the ACT deficits for manufacturers until ZEV chassis are available.

The clock is ticking for small businesses, their employees and truck drivers who are the lifeline of emergency and roadside services for millions of California motorists.

Thank you.

Sincerely,

Mark peeples
2361 Fruitvale Ave Apt Apt3
Oakland, CA 94601
mwill1666@yahoo.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-05-13 11:40:40

No Duplicates.

Comment 1 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024). (At Hearing)

First Name: John

Last Name: Takahashi

Email Address: takahashij@metro.net

Affiliation:

Subject: Caltrans Freeway Service Patrol Program Exemption

Comment:

Freeway Service Patrol is a Caltrans congestion mitigation program operated by 14 local agencies across the state. As a program we operate over 300 clean diesel tow trucks during peak commuting hours to assist motorists with disabled vehicles.

Disabled vehicles on the freeway environment reduce freeway speeds due to rubber necking and secondary accidents. Reduced freeway speeds increase vehicle emissions and fuel consumption. Two things that this board is working to reduce. Freeway Service Patrol program quickly assists motorists with disabled vehicles which enables traffic to return to normal speeds.

This is a public service program funded by state and local tax dollars, where premature implementation of zero emissions tow trucks could increase program costs, reduce service levels and reliability which may translate to increased congestion, emissions, and fuel consumption.

I ask that this board have staff reach out to Caltrans to discuss the possibility of exempting this program from the zero emissions requirement till we can determine that the technology for tow trucks has matured and can meet our program requirements. I have also asked Caltrans to reach out to the CARB to discuss the possibility of an exemption.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-05-23 09:17:48

No Duplicates.