

**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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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:

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

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.

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

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  $-0.0001087^{\circ}\text{C}$  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: Saliccioli

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: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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: Marlk

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 (actzepcert2024) - 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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-actzepcert2024-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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-actzepcert2024-UzICZ1UgBAhWlgJn.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: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-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: Peebles

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.

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

First Name: ashley

Last Name: porter

Email Address: aporter@tecequipment.com

Affiliation: TEC Equipment

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-actzepcert2024-UTBUIVM6Um0CYQd+.pdf>

Original File Name: ashleyporter.pdf

Date and Time Comment Was Submitted: 2024-10-24 09:42:34

No Duplicates.

### **Comment 3 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024). (At Hearing)**

First Name: Mark

Last Name: Sales

Email Address: mstone@burrtruck.com

Affiliation:

Subject: Carb Act Rule State Of New York

Comment:

Team,

We are a Volvo, Isuzu & Hino & Workhorse Dealer in the state of New York. We have sold 1 of the total 34 total class 8 BEV's in the state of New York, and the first Northeast Dealer to be BEV certified. We 100% support the ACT rule, but not to the extent of loss of jobs & businesses in New York. Here, at Burr Truck, we are the only Public Charging System in the state with a 125 KW DC Level 3 Fast Charger that allows trailer parking to charge two trucks. We are asking for a 2 year pause in the state of New York because our state has made no investments to support trucking for BEV's. That being said, how can what is good for California be good for New York today knowing these facts. Can New York get a two-year pause approved by California and start at ratio's for the 2025 in 2027 as opposed to the 2027 ratio's. meaning 7% in 2027 vs 15% as mentioned in the below for class 7-8 tractors & rigid trucks. The OEM's place dealer under allotments because they never have nor ever will have enough ZEV credits to ever catch up. Although this rule is based upon OEM's not dealers, the OEM's have no choice to place dealers in ACT states under allotments to get enough credits. This is and will make dealers go out of business because dealers sell trucks not OEM's. Example We had 200 trucks sold in 2025 but will only get 13 trucks now. We know that wasn't the intent of Carb ACT to make dealers go out of business. Since there are significant infrastructure deficits to support ACT in New York State, should there not be a bilateral support given to meet the goals? This would be a more commonsense approach to support job growth in the state and clean the air with more ZEV's by working together united for a greener and more sustainable approach.

Model Year	Class 2b-3	Class 4-8	Class 7-8 Tractors
2025	7%	11%	7%
2026	10%	13%	10%
2027	15%	20%	15%
2028	20%	30%	20%
2029	25%	40%	25%
2030	30%	50%	30%
2031	35%	55%	35%
2032	40%	60%	40%
2033	45%	65%	40%
2034	50%	70%	40%

2035 and subsequent 55% 75% 40%

Respectfully,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 10:19:51

No Duplicates.

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

First Name: Anthony

Last Name: Bento

Email Address: abento@cncda.org

Affiliation: CNCDA

Subject: Letter from Kim Mesfin at Affinity Truck Center

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-actzepcert2024-WzgHYFckBTQEXVU5.docx>

Original File Name: CARB Letter 10.24.24.docx

Date and Time Comment Was Submitted: 2024-10-24 11:29:15

No Duplicates.

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

First Name: Gavin

Last Name: Hursh

Email Address: Gavinhursh@gmail.com

Affiliation:

Subject: Clean trucks regulation

Comment:

The gasoline prices are already too high in California.

The regulations on gasoline engines are already too prevalent in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 12:53:20

No Duplicates.

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

First Name: Wilson

Last Name: Rios

Email Address: wilsonrios124@gmail.com

Affiliation:

Subject: Firefighter

Comment:

This new legislation is going to hurt the regular Joe working a 9-5. Im currently a firefighter and it's tough for me and my spouse. Mind you we both have good careers but are only making enough for us. Eventually we'd want a family but I couldn't dare dream of having a "family" under these new laws that will inevitably be the end of our stay here in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 13:36:24

No Duplicates.

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

First Name: Gavin

Last Name: Hursh

Email Address: Gavinhursh@gmail.com

Affiliation:

Subject: Clean trucks regulation

Comment:

The gasoline prices are already too high in California.  
The regulations on gasoline engines are already too prevalent in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 12:53:20

No Duplicates.

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

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Subject: ACT Rule Ammendments

Comment:

Central California Asthma Collaborative (CCAC) stands in support of this latest changes to the Advanced Clean Truck Rule. Mobile source emissions from trucks of all classes are responsible for the majority of air pollution and climate emissions in California and most of the nation. These changes ensure that the wide variety of vehicles are available to the the industry to meet both everyday and more nuanced needs in the numbers that ensure CA stays on track to meet the 2045 goal of 100% new ZEV truck sales. Most importantly, these changes provide market flexibility without surrendering critical accountability and safety requirements. CCAC also believes these changes will directly and indirectly create an accelerated increase in the number of ZEV trucks reaching the secondary market. The secondary or "used" vehicle market is critical for smaller trucking concerns who often operate locally in low income communities, that are already bearing the brunt of air pollution and climate impacts to their health and local economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 14:02:22

No Duplicates.

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

First Name: Matthew

Last Name: Spears

Email Address: matthew.spears@cummins.com

Affiliation: Cummins Inc.

Subject: Cummins Oral Comments

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-actzepcert2024-AGNXJAZqVmgAbwZo.pdf>

Original File Name: Cummins Oral Comments CARB Board Mtg Oct 24 2024.pdf

Date and Time Comment Was Submitted: 2024-10-24 13:53:50

No Duplicates.

## **Comment 10 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024). (At Hearing)**

First Name: Tim

Last Name: DeMartini

Email Address: tim@demartini.com

Affiliation:

Subject: DeMartini RV concerns with ACT

Comment:

Hello, I'm Tim DeMartini and I am the owner of DeMartini RV Sales

- o In business for 50 years

- o Sell the highest volume of Class A Diesel Motorhomes in California

- o Last year we had \$75 million in sales and about 2/3 of sales were to CA residents

- Reason I'm here to speak

- o Our business relies on selling new luxury Diesel Motorhomes

- o The Newmar Dutch Star is the number one selling Class A Diesel Motorhome - Last year there were 34 sold to CA and we sold over 30 of them.

- o California adopted the CARB Omnibus program that began this year.

We've been operating under this program which charges a \$10K penalty on diesel engines sold to CA. This program has caused a major reduction in supply of diesel engines to the state of CA and has severely impacted us. Our diesel sales have been reduced by 50 percent compared to last year without the Omnibus program.

- o The addition of the ACT program is threatening to eliminate all of our diesel motorhome sales. There is no alternative electric motorhome being efficiently built which limits the supply of diesel engines/chassis for motorhomes to almost zero.

- o My manufacturers cannot get CA approved engines/chassis to build the motorhomes on

- o Example: Customer just lost his wife and placed an order for a new \$650K Newmar diesel motorhome. I placed the order and was told by the factory that they CANNOT get a chassis that can be sold to a CA buyer due to the ACT and CARB restrictions.

- Proposal to make RV's EXEMPT

- o I believe that these restrictions should not apply to the diesel motorhome market and that they should be exempt

- o REASONS INCLUDE:

- o Motorhomes are not a major source of pollution to the state of CA :

- &#61607; Most of them are purchased for the majority of their use to travel outside of the state of CA

- &#61607; Low annual mileage - average 3,000 to 5,000 miles per year and only a portion of that is in the state of CA

- &#61607; Luxury Diesel Pushers have the highest proportion of full time living owners - this is a home for many CA residents

- &#61607; High amount of seasonal usage means the majority of the year they are sitting in storage

- o This severely restricts the rights of CA residents who wish to

purchase a diesel motorhome. Many of them having owning one as a lifetime retirement dream.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 14:35:47

No Duplicates.

**Comment 1 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: CHRIS

Last Name: BRIMHALL

Email Address: brimmie1608@gmail.com

Affiliation:

Subject: Fuel emissions for large trucks and motorcycles

Comment:

Once again you are attacking citizens and businesses over this outrageous democratic Green Agenda. California already has extremely tight emissions standards, but going for ZERO is completely unrealistic and unacceptable. This would crush truck drivers delivering our goods and services and everything would go way up in price. Please STOP THIS INSANITY

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 16:07:10

No Duplicates.

**Comment 2 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Ron

Last Name: Frank

Email Address: ron.frank@dot.ca.gov

Affiliation: California DOT

Subject: Comment for Page 5, Section 7

Comment:

Comment for Page 5, Section 7 of Summary of Proposed Modifications for CARB 15-day Notice.

Caltrans Division of Equipment proposes to further amend section 1963.2(e), to read "secondary vehicle manufacturers have the option to purchase, trade, sell, or otherwise transfer ZEV and NZEV credits with manufacturers."

The proposed amendment to add "purchase" to this section will further allow secondary vehicle manufacturers to participate in the credit banking and trading system of the ACT regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-17 11:20:11

No Duplicates.

**Comment 3 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA Comment Letter on 15-Day Modifications to ACT

Comment:

We appreciate the opportunity to provide these comments on the 15-Day Modifications for the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure. Thank you for your consideration of our position.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-actzepcert2024-UTIAAdFQhAzFSC1c0.pdf>

Original File Name: CRTA Comments on ACT 15-Day Modifications\_101824.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:09:38

No Duplicates.

**Comment 4 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Greg

Last Name: Rasmussen

Email Address: gcrcsr@gmail.com

Affiliation:

Subject: No Gas Price Increase

Comment:

California Air Resources Board (CARB) is set to vote next month on new regulations that could raise gas prices by as much as 65 cents per gallon' adding even more strain to budgets already stretched by high fuel costs.

If approved' prices could rise steadily' potentially reaching up to \$1.50 more per gallon by 2035.

Californians cannot afford this, folks. Newsom just signed legislation to stop price spikes. Yet Carb is poised to do the opposite.

Stop Carb fees and taxes. We cannot afford it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 19:15:08

No Duplicates.

**Comment 5 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Michael

Last Name: Ochs

Email Address: mochs@rvia.org

Affiliation: RV Industry Association

Subject: Proposed Amendments to the Advanced Clean Trucks Regulation

Comment:

Attached please the comment letter of the RV Industry Association on the proposed amendments to the Advanced Clean Trucks Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-actzepcert2024-WylSIHQ8UmAKUwlq.pdf>

Original File Name: RVIA Comment letter to CARB re ACT 102124.pdf

Date and Time Comment Was Submitted: 2024-10-21 10:43:55

No Duplicates.

**Comment 6 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Deborah

Last Name: Curtis

Email Address: buchserbabe53@gmail.com

Affiliation:

Subject: Electric vehicles and trucks

Comment:

Do you not remember the battery recycling plant in LA? What are you going to be doing with all of these batteries from all of the supposed electric vehicles you don't have a viable solution and those people that surrounded that battery plant are still paying the price even though the money was to clean up their properties from the cancer, causing agents from the battery plant they still suffered today because California has not followed through and made the companies follow through with the cleanup of their property and that has been years ....

This is not an environmentally safe or wise plan

And put a hold on the CARB

Discussions so that we can get an accurate not estimated cost that we will be paying for gas

And honestly, if it's such a good idea, maybe the state of California should just make up the difference and not charge us the gasoline tax at all

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-21 13:47:40

No Duplicates.

**Comment 7 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Kevin

Last Name: Brown

Email Address: kbrown@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on the Proposed ACT and Zero-Emission Powertrain Certification Procedure

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-actzepcert2024-WjdUN1c1AzEBWAhr.pdf>

Original File Name: MECA\_comments\_CARB\_ACT\_Amendments\_211024 FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-21 13:50:36

No Duplicates.

**Comment 8 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Chad

Last Name: Reece

Email Address: creece@wgo.net

Affiliation: Winnebago Industries Inc.

Subject: Comments on Proposed Amendments to the Advanced Clean Truck (ACT) Regulation  
Comment:

Winnebago Industries appreciates this opportunity to comment on the latest Proposed Amendments to the Advanced Clean Truck (ACT) Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-actzepcert2024-VCNXOAFuWGVSMVc1.docx>

Original File Name: Winnebago Industries CARB ACT Comment Letter 10-21-25.docx

Date and Time Comment Was Submitted: 2024-10-21 14:24:52

No Duplicates.

**Comment 9 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Megan

Last Name: O'Toole

Email Address: motoole@nescaum.org

Affiliation: NE States for Coordinated Air Use Mgmt

Subject: Proposed 15-Day Changes to Amendments to the Advanced Clean Trucks Regulation  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-actzepcert2024-BWQHYgdyUC5RZgUw.pdf>

Original File Name: act-15-day-changes-nescaum-comments-20241022.pdf

Date and Time Comment Was Submitted: 2024-10-22 09:25:11

No Duplicates.

**Comment 10 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Kirk

Last Name: Blackburn, CTTA

Email Address: lobby@ellisonwilson.com

Affiliation: California Tow Truck Association

Subject: California Tow Truck Association Comments on 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 15-Day Modifications to the Proposed Amendments to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain Certification Test Procedure" released on October 7, 2024. In light of ongoing concerns about the availability of tow trucks for sale in California as a result of CARB's actions, CTTA respectfully requests additional relief from the ACT Regulation for towing and recovery equipment. Such relief will ultimately reduce emissions and increase safety for first responders and the motoring public.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-actzepcert2024-UDMFdwB1V2UCW1Q3.pdf>

Original File Name: CTTA CARB ACT Comments.10-22-24.pdf

Date and Time Comment Was Submitted: 2024-10-22 10:46:57

No Duplicates.

**Comment 11 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Daniel

Last Name: Ingber

Email Address: ingberd@nada.org

Affiliation:

Subject: Comment on the proposed ACT rule amendments

Comment:

Please see the attached comment letter regarding the proposed amendments to the Advanced Clean Trucks (ACT) regulation filed on behalf of the American Truck Dealers division of the National Automobile Dealers Association (ATD).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-actzepcert2024-B2EFalc4WGoHbQdY.pdf>

Original File Name: Final Comment Letter re ACT Amendments.pdf

Date and Time Comment Was Submitted: 2024-10-22 11:16:22

No Duplicates.

**Comment 12 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Michael

Last Name: Kastner

Email Address: mkastner@ntea.com

Affiliation: NTEA - The Work Truck Association

Subject: ZEV and NZEV Credits

Comment:

Attached are comments from NTEA - The Work Truck Association pertaining to the proposed amendment to include secondary vehicle manufacturers in the ZEV and NZEV credit selling and trading market.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-actzepcert2024-VjVcOwNwUGFWDwNg.pdf>

Original File Name: CARB Credit NTEA Comments 10\_22\_2024.pdf

Date and Time Comment Was Submitted: 2024-10-22 11:36:44

No Duplicates.

**Comment 13 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Catherine

Last Name: Palin

Email Address: cpalin@autosinnovate.org

Affiliation:

Subject: Auto Innovators Comments on ACT 15 Day Amendments 10-22-2024

Comment:

Please see the attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-actzepcert2024-VzQFbABsUG5WNQNt.pdf>

Original File Name: Comments to CARB on ACT 15 Day Amendments 10-22-2024.pdf

Date and Time Comment Was Submitted: 2024-10-22 12:32:40

No Duplicates.

**Comment 14 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Tim

Last Name: Taylor

Email Address: [timtaylor264@gmail.com](mailto:timtaylor264@gmail.com)

Affiliation: NFIB

Subject: Advanced Clean Trucks Regulation

Comment:

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-actzepcert2024-Uj5SMVwpWX4DYAd1.pdf>

Original File Name: Letter to CARB 10-22-2024.pdf

Date and Time Comment Was Submitted: 2024-10-22 13:00:03

No Duplicates.

**Comment 15 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Jeff

Last Name: Foor

Email Address: jeff.foor@stellantis.com

Affiliation: Stellantis

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

Comment:

See attached for Stellantis' comments on the 15-day changes published October 7, 2024.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-actzepcert2024-B3RXJQFIWGcHbQVk.pdf>

Original File Name: Stellantis Comments on 15 day changes to CARB ACT Amendments\_Final.pdf

Date and Time Comment Was Submitted: 2024-10-22 13:25:09

No Duplicates.

**Comment 16 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Greg

Last Name: Hurner

Email Address: greg@hgra.us

Affiliation: Hurner Government Relations and Advocacy

Subject: Comments from Miller Industries, Inc.

Comment:

Please see attached comment letter.

Thank you,

Greg

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-actzepcert2024-UD0Aal0uBwtWMwRl.pdf>

Original File Name: MLR CARB Comment Letter 10222024.pdf

Date and Time Comment Was Submitted: 2024-10-22 14:13:29

No Duplicates.

**Comment 17 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Gilbert

Last Name: Bacis

Email Address: afdtowing108@gmail.com

Affiliation: CTTA

Subject: Towing

Comment:

As an owner of a small towing company that employs five people I am extremely concerned that CARB regulations will close us down. Mandating electric tow trucks will not work as the technology has not yet come about. The cost of buying electric is way out of reach for small tow companies. We need to take a more sensible approach. I don't know the back grounds of the people making these decisions but someone has to be more educated in the industry to see that the rules being implemented will destroy many small businesses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-22 14:32:59

No Duplicates.

**Comment 18 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Timothy

Last Name: French

Email Address: tfrench@clpchicago.com

Affiliation: Truck & Engine Manufacturers Association

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

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-actzepcert2024-AGUCaQFhBwsGYwRr.pdf>

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

Date and Time Comment Was Submitted: 2024-10-22 14:40:12

No Duplicates.

**Comment 19 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Anthony

Last Name: Bento

Email Address: abento@cncda.org

Affiliation: California New Car Dealers Association

Subject: CNCDA Comments on Proposed ACT Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-actzepcert2024-UDFQNVEkBAhVMgRp.pdf>

Original File Name: ACT Amendments - CNCDA Comments FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-22 14:47:39

No Duplicates.

**Comment 20 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: David

Last Name: Smith

Email Address: dsmith@oshkoshcorp.com

Affiliation: Oshkosh Corporation

Subject: Proposed Advanced Clean Trucks Regulations and the Zero Emissions Powertrain Certification

Comment:

Please see attached comment letter from Oshkosh Corporation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-actzepcert2024-VTYCa1Q4BDpWNQhm.pdf>

Original File Name: Comments of Oshkosh Corporation 10222024.pdf

Date and Time Comment Was Submitted: 2024-10-22 15:11:02

No Duplicates.

**Comment 21 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Chris

Last Name: Nevers

Email Address: cnevers@rivian.com

Affiliation: Rivian

Subject: Support of Proposed Amendments to ACT and ZEP.

Comment:

Rivian appreciates the opportunity to support the 15-Day Modifications for the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure.

Comments Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-actzepcert2024-USNWOQdwUGoAZwhm.pdf>

Original File Name: Rivian\_ACT\_Amendments15DayComments\_October\_22.pdf

Date and Time Comment Was Submitted: 2024-10-22 15:12:32

No Duplicates.

**Comment 22 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: James

Last Name: Fahy

Email Address: james.fahy@mercedes-benz.com

Affiliation: Mercedes-Benz R&D North America

Subject: Mercedes-Benz AG Comments on Proposed Amendments to the Advanced Clean Trucks Regulation

Comment:

Dear Chair Randolph,

Mercedes-Benz AG is pleased to submit comments on the Proposed Amendments to the Advanced Clean Trucks Regulation.  
Thank you for your leadership and consideration of our comments.

-James Fahy

Mercedes-Benz R&D North America

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-actzepcert2024-ADJQZlxvA2QANwc3.pdf>

Original File Name: 20241022 Mercedes-Benz Advanced Clean Trucks 15 Day Notice Comments.pdf

Date and Time Comment Was Submitted: 2024-10-22 15:20:27

No Duplicates.

**Comment 23 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Michael

Last Name: Vergara

Email Address: mvergara@somachlaw.com

Affiliation:

Subject: Proposed Amendments to ACT Regulation and ZE Powertrain Certification  
Comment:

Good afternoon, attached please find the comments of Municipal Maintenance Equipment, Inc., et al., regarding the above-referenced proposed amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-actzepcert2024-U2JXYVdkAGEDNwAw.pdf>

Original File Name: 10222024 Comment Letter Regarding Proposed ACT Amendments (00187681xD2C75).PDF

Date and Time Comment Was Submitted: 2024-10-22 15:58:01

No Duplicates.

**Comment 24 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Peter

Last Name: Okurowski

Email Address: petero@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on CARB's Modified Text for the Proposed Amendments to the ACT

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-actzepcert2024-W2lRZ1RnA2QCKgEw.pdf>

Original File Name: 2024.10.22 CCEEB ACT Comments.pdf

Date and Time Comment Was Submitted: 2024-10-22 17:21:40

No Duplicates.

**Comment 25 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Katie

Last Name: Saliccioli

Email Address: ksalcicc@ford.com

Affiliation: Ford

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

Comment:

Attached are Ford's comments on the proposed amendments to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain Certification Test Procedure. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-actzepcert2024-UzUCa1YlAzQBWAdk.pdf>

Original File Name: Ford Comments on the ACT Second 15-Day Changes - 22Oct2024.pdf

Date and Time Comment Was Submitted: 2024-10-22 17:22:08

No Duplicates.

**Comment 26 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Grace

Last Name: Pratt

Email Address: grace@caliberstrat.com

Affiliation: California New Car Dealers Association

Subject: California Truck Dealer Letters on ACT

Comment:

Please see the attached letters from California Truck Dealers currently impacted by inventory shortages due to Advanced Clean Trucks and the Low NOx Omnibus rules.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-actzepcert2024-W2kGMFFiUTYFLgc2.pdf>

Original File Name: 2024-10-22 California Truck Dealers - Letters to CARB.pdf

Date and Time Comment Was Submitted: 2024-10-22 17:30:49

No Duplicates.

**Comment 27 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: George

Last Name: Miller

Email Address: george.miller@asm.ca.gov

Affiliation: Assemblymember Blanca Rubio (Staff)

Subject: ACT - Tow and Recovery Vehicles

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-actzepcert2024-VTkAY1QhBCMhZAI7.pdf>

Original File Name: Letter to CARB - Tow Trucks (Final).pdf

Date and Time Comment Was Submitted: 2024-10-22 18:32:58

No Duplicates.

**Comment 28 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Greg

Last Name: Hurner

Email Address: greg@hgra.us

Affiliation: CA Safe Roads Coalition

Subject: Petition from CA Safe Roads Coalition

Comment:

Please see attached petition from over 120 individuals and companies involved in the tow and recovery industry as part of the CA Safe Roads Coalition.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-actzepcert2024-UGFcagYqAmNSYABf.pdf>

Original File Name: 10-24 CA Safe Roads Petition.pdf

Date and Time Comment Was Submitted: 2024-10-22 19:06:16

No Duplicates.

**Comment 29 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-1.**

First Name: Frank

Last Name: Verdugo

Email Address: fwverdugo@gmail.com

Affiliation:

Subject: CARB

Comment:

I am a small business owner of a Tow Truck company. We have been a family owned business in Watsonville, California since 1971. Like most smallll towing businesses In California we will not survive if you pass these regulations. We humbly ask that you make us exempt so that we can continue to serve our community. We help keep the roads safe 24/7. Forcing businesses to go Electric will be catastrophic for our roadways. We truly hope that you reconsider.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-22 22:01:40

No Duplicates.

**Comment 1 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzeperc2024) - 15-2.**

First Name: Robert

Last Name: Piazzisi

Email Address: piazzisi@sbcglobal.net

Affiliation:

Subject: Motorhomes should be exempt

Comment:

Requiring motorhomes to comply to the ACT will provide little improvement to emissions since most Rv'ers like myself usually drive from point A to point B and park in a RV resort or campground. RVs are not commute vehicles. Most RVs have low yearly miles put on them.

Restricting this industry will have huge cost impacts and job losses not to mention that you are taking away our freedoms and our pursuit of happiness and our getaway time. Now we have big brother again nosing its way into our business, disrupting our lives, and putting their hands into our pocket for more cash. Please use some common sense and stop this madness concerning RV's.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-24 22:05:42

No Duplicates.

**Comment 2 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Timothy

Last Name: French

Email Address: tfrench@clpchicago.com

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments

Comment:

Please see the attached comments in response to CARB's second set of 15-day changes to the ACT regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-actzepcert2024-VDEGbQZmWVVQNQlm.pdf>

Original File Name: EMA Comments Proposed Amendments to the ACT Reg and the Zero Emission Powertrain Cert Test Procedure Second Public Availability of Modified Text.pdf

Date and Time Comment Was Submitted: 2024-12-05 14:11:59

No Duplicates.

**Comment 3 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Catherine

Last Name: Palin

Email Address: cpalin@autosinnovate.org

Affiliation: Alliance for Automotive Innovation

Subject: Auto Innovators Comments on ACT 15 Day Amendments 12-6-2024

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-actzepcert2024-UDNROFQ4VmhVNIA+.pdf>

Original File Name: Comments to CARB on ACT 15 Day Amendments 12-6-2024.pdf

Date and Time Comment Was Submitted: 2024-12-06 11:20:50

No Duplicates.

**Comment 4 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: RAJINDER

Last Name: DHATT

Email Address: rajinder.dhatt@stellantis.com

Affiliation:

Subject: Stellantis Comments on Second 15-day Changes to CARB ACT Amendments  
Comment:

Attached are Stellantis comments on the second 15-day changes to ACT Amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-actzepcert2024-VCdSIAFIVmkEblQ1.pdf>

Original File Name: Stellantis Comments on Second 15-day Changes to CARB ACT Amendments\_Final.pdf

Date and Time Comment Was Submitted: 2024-12-06 12:32:00

No Duplicates.

**Comment 5 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: James

Last Name: Fahy

Email Address: james.fahy@mercedes-benz.com

Affiliation: Mercedes-Benz R&D North America

Subject: Mercedes-Benz AG Comments on Proposed Amendments to the Advanced Clean Trucks Regulation

Comment:

Dear Chair Randolph,

Mercedes-Benz AG is pleased to submit comments on the 2nd 15-day Change Proposed Amendments to the Advanced Clean Trucks Regulation.

Thank you for your leadership and consideration of our comments.

-James Fahy

Mercedes-Benz R&D North America

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-actzepcert2024-W2ITZVdkUjUANwk7.pdf>

Original File Name: 20241206 - Mercedes-Benz AG Comments on Proposed Amendments to the Advanced Clean Trucks Regulation- 2nd 15 Day Notice.pdf

Date and Time Comment Was Submitted: 2024-12-06 12:46:14

No Duplicates.

**Comment 6 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: LEE

Last Name: BROWN

Email Address: LEEBROWN@WESTRK.ORG

Affiliation:

Subject: WSTA Comments on ACT Amendments

Comment:

Please consider the attached comments.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-actzepcert2024-AXZQJV0oWGoBWFc0.pdf>

Original File Name: WSTA Comments on ACT Regulation-December 6 2024 AS SUBMITTED.pdf

Date and Time Comment Was Submitted: 2024-12-06 13:21:30

No Duplicates.

**Comment 7 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Katie

Last Name: Saliccioli

Email Address: ksalcicc@ford.com

Affiliation: Ford

Subject: Comments on the Second 15-Day Changes to the ACT and ZEP Certification Test Procedure

Comment:

Attached are Ford's comments on the proposed Second 15-Day Changes to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain Certification Test Procedure. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-actzepcert2024-VzFVPANwWW4EXVIx.pdf>

Original File Name: Ford Comments on the ACT Second 15-Day Changes - 6Dec2024.pdf

Date and Time Comment Was Submitted: 2024-12-06 13:40:45

No Duplicates.

## **Comment 8 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Barbara

Last Name: Cox-Winter

Email Address: barb@cox-winter.com

Affiliation:

Subject: Public Comments

Comment:

I am responding to the request for comments on the proposed Amendments to the Advanced Clean Trucks regulation and the ZERO-Emission Powertrain Certification Test Procedure. The proposed amendments to apply these regulations to vehicles with a GVW of 8500 or higher with no exceptions for vehicles that are typically driven for less than 8,000 miles PER year seems onerous and discriminatory to California residents that own and operate Recreational Vehicles.

The typical RV owner drives less than 8,000 per year (many only 2,000-5,000 miles per year) as the primary PURPOSE of such vehicles is to drive a few hours away to a state park, national park or other non-urban setting and STAYING for several days at a time. Unlike large 18 wheelers (Semi tractor) that typically drive 80,000-110,000 miles PER YEAR, RVs are not purchased or used with the intent to log lots of miles. The PRIMARY purpose of a SEMI Tractor is to drive AS MUCH AS POSSIBLE to move cargo.

I beg you to rethink the impact of a blanket BAN on all on-road vehicles over 8500 GVWR. Consider the PURPOSE of a vehicle in determining the IMPACT on our air. Absent an exemption for RVs, please consider an exemption for RVs that are equipped with solar panels AND a CARB compliant generator as these features are intended to reduce any impact on the environment when stationary. We, as consumers, need more clarity from CARB as to how this impacts the RVs that we purchase. I personally placed an order for an RV back in APRIL 2023 and have yet to receive it due to the backlog of this manufacturer.

Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-actzepcert2024-AGQGZVEzAzUFbgJg.pdf>

Original File Name: December 5.CARB.letter.pdf

Date and Time Comment Was Submitted: 2024-12-06 13:49:17

No Duplicates.

**Comment 9 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Anthony

Last Name: Bento

Email Address: abento@cncda.org

Affiliation: California New Car Dealers Association

Subject: CNCDA ACT 15-day Amendments Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-actzepcert2024-BTdVYwQ3WD8HLFJj.pdf>

Original File Name: 2024-12-06 CNCDA ACT 15-day Amendments Comments.pdf

Date and Time Comment Was Submitted: 2024-12-06 13:54:49

No Duplicates.

**Comment 10 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: ACT: Clean Energy Comments on Second 15-Day Package

Comment:

Thank you for considering the attached comments from Clean Energy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-actzepcert2024-UzAHbVI9VWMBWAl0.pdf>

Original File Name: CLNE ACT 15 Day Notice Nov 2024.pdf

Date and Time Comment Was Submitted: 2024-12-06 14:37:29

No Duplicates.

**Comment 11 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Mike

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation:

Subject: Comments of the California and American Trucking Associations

Comment:

Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-actzepcert2024-UGIHMVJhVjELIwBj.pdf>

Original File Name: 2024.CTA-ATA.ACT 2nd 15 day Comments.pdf

Date and Time Comment Was Submitted: 2024-12-06 15:15:51

No Duplicates.

**Comment 12 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: Resource Recovery Coalition of CA

Subject: RRCC Comments on Proposed ACT Amendments

Comment:

The Resource Recovery Coalition of California (RRCC) appreciates the opportunity to provide comments on the proposed ACT regulation amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-actzepcert2024-VTRUMVQhWVVXYFdi.pdf>

Original File Name: ACT 15-day Comments.pdf

Date and Time Comment Was Submitted: 2024-12-06 16:45:19

No Duplicates.

**Comment 13 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA Comment Letter on Second 15-Day Changes to Proposed ACT Amendments  
Comment:

CRTA appreciates this opportunity to provide these comments on this regulatory action.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-actzepcert2024-AWIGclInUWMBWAVm.pdf>

Original File Name: CRTA Comments on 2nd ACT 15-Day Modifications\_120624.pdf

Date and Time Comment Was Submitted: 2024-12-06 16:55:03

No Duplicates.

**Comment 14 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

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:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-actzepcert2024-VzoAb1M+AD8DYFQm.pdf>

Original File Name: MILLER INDUSTRIES, INC Second 15 day change draft comment letter[55].pdf

Date and Time Comment Was Submitted: 2024-12-06 21:01:20

No Duplicates.

**Comment 15 for Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (actzepcert2024) - 15-2.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: The Construction Industry Air Quality Co

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

Comment:

Comment submitted by Clerk on behalf of commenter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-actzepcert2024-UjEGaVIyBSdRNFQL.docx>

Original File Name: CIAQC Comment letter Proposed Amendments to the ACT Regulation and Zero-Emission Powertrain Certification Test Procedure.docx

Date and Time Comment Was Submitted: 2024-12-09 09:51:03

No Duplicates.