October 12, 2022

California Air Resources Board (CARB)

Subject: The Advanced Clean Fleets Regulation (ACF) Proposal

We ask CARB to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state, and federal fleets) can and cannot feasibly manage the transition being proposed.

We request CARB engage with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations. Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations.

We request that CARB prepare an environmental impact report required under CEQA for the estimated 500,000 new high voltage charging stations that must be in place to make this new proposed mandate feasible.

Respectfully submitted,

Jon Kay
President