

RE: 11647 or new 216797

Steve Ellsworth <steve.000@ellco.net>

Fri 8/11/2023 2:32 PM

To: ARB ZEV Fleet <zevfleet@arb.ca.gov>

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Yes add

From: ARB ZEV Fleet <zevfleet@arb.ca.gov>**Sent:** Friday, August 11, 2023 1:54 PM**To:** Steve Ellsworth <steve.000@ellco.net>; Johnston, Jesica@ARB <Jesica.Johnston@arb.ca.gov>; Freeman, Andre@ARB <Andre.Freeman@arb.ca.gov>**Subject:** Re: 11647 or new 216797

Thanks Steve,

It does not sound like you would be subject to the High Priority Fleets portion of the regulation, but would be required to comply with the drayage portion of the regulation for any of these that are Class 7 or 8 vehicles. Please reach out to the cc'd staff if you have further questions about the drayage portion of the ACF regulation.

Also, please confirm whether you want your initial question added to our ACF regulation public comment docket; if you do not respond, I am obligated per the Government Code to add your emails to the docket.

Chris Franceschi
Air Pollution Specialist

From: Steve Ellsworth <steve.000@ellco.net>**Sent:** Friday, August 11, 2023 1:50 PM**To:** ARB ZEV Fleet <zevfleet@arb.ca.gov>**Subject:** RE: 11647 or new 216797

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A snap shot of our fleet

20 trucks, 2 million in sales

(2) 2012 CNG engine 200,000 miles

(18) 2013 - 2016 CNG engines 250,000 miles – 1,000,000 miles

Fleet is 90% 2015 model year CNG engines

From: ARB ZEV Fleet <zevfleet@arb.ca.gov>**Sent:** Friday, August 11, 2023 12:38 PM**To:** Steve Ellsworth <steve.000@ellco.net>**Cc:** Johnston, Jesica@ARB <Jesica.Johnston@arb.ca.gov>; Freeman, Andre@ARB <Andre.Freeman@arb.ca.gov>**Subject:** Re: 11647 or new 216797

Hi Steve,

Then yes, you would be subject to the drayage portion of the regulation, which has very limited options for extensions or exemptions. You may also be subject to the High Priority fleets portion simultaneously if you have 50 or more vehicles, or \$50 million or more in annual revenues. Regardless of fuel type, beginning January 1, 2025, combustion vehicles will need to be removed from Drayage service at the end of the vehicle's useful life, which again is 13 years from the model year of the engine in the vehicle, or up to 18 years or 800,000 miles, whichever comes first. You will need to report your drayage vehicles in the TRUCRS reporting system no later than December 31, 2023. We are working on getting the system ready for reporting and anticipate reporting to be available some time over the next month or two. Please sign up for the ACF list serv at https://public.govdelivery.com/accounts/CARB/subscriber/new?topic_id=zevfleet to be notified when reporting is available.

For High Priority fleets, if you are also subject to that regulation, any vehicles that are in the scope of the regulation would need to be reported no later than February 1, 2024.

I am cc'ing our drayage staff if they have anything to add.

Please confirm whether you want your initial question added to our ACF regulation public comment docket; if you do not respond, I am obligated per the Government Code to add your email to the docket.

Hope this helps,

Chris Franceschi
Air Pollution Specialist

From: Steve Ellsworth <steve.000@ellco.net>
Sent: Friday, August 11, 2023 11:39 AM
To: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Subject: RE: 11647 or new 216797

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We currently run OTR over the road truckload freight inter and intra California
And yes we are currently running in/out of the rail yards

From: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Sent: Friday, August 11, 2023 7:33 AM
To: Steve Ellsworth <steve.000@ellco.net>
Subject: Re: 11647 or new 216797

Hi Steve,

As we are currently in a 15-day comment period for the ACF regulation, I need to include a disclaimer at the end of this email. Please review it and let me know if you would like your email submitted to our ACF comment docket as a comment on the proposed 15-day changes. I will need a response from you, otherwise I am obligated to add your email to our comment period.

To answer your questions:

First, we need to determine whether you are subject to the regulation, and if so, which portion of the regulation your fleet falls under.

The ACF regulation has four primary components, 3 of which are fleet regulations, and one manufacturer regulation.

The fleet regulations are broken into drayage (vehicles that visit seaports/ intermodal railyards), High Priority Fleets, and State and Local Government fleets.

High priority fleets are those that operate one affected vehicle (GVWR 8,500+ lbs., on- and off-road yard tractors, or light-duty package delivery vehicles) in California, regardless of fuel type (gasoline, CNG, diesel, electric, etc.) and that have either: \$50 Million in annual revenues, or own, operate, or direct 50 or more affected vehicles. If either of these qualifications sound like your fleet, then you would be subject to the ACF regulation for High Priority Fleets. For description of the requirements for these fleets, please see our fact sheets posted on the [Advanced Clean Fleets Fact Sheets | California Air Resources Board](#) webpage:

[Advanced Clean Fleets Regulation Overview | California Air Resources Board](#)

[Advanced Clean Fleets Regulation Summary | California Air Resources Board](#)

[Advanced Clean Fleets Regulation High Priority and Federal Fleets Overview | California Air Resources Board](#)

[Advanced Clean Fleets Regulation ZEV Milestones Option | California Air Resources Board](#)

The first two links here summarize the regulation, and the last two are the two compliance options for High Priority Fleets. There is a reporting requirement for fleets subject to the regulation; they must report in the TRUCRS system no later than February 1, 2024 to let us know which option they will comply with.

The default requirements for High Priority Fleets is called the "Model Year Schedule". If using this option, no vehicles may be added to the California fleet starting January 1, 2024, unless it is a ZEV. Additionally, existing combustion (ICE) vehicles must be removed from the California fleet at the end of the vehicle's useful life, which is at least 13 years from the model year of the engine, and up to 18 years or 800,000 miles, whichever comes first. So if you have newer vehicles, you would report all of them that come to California (or could come to California) no later than February 1, 2024, and you would be able to continue using them until the engine is at least 13 years old, then must remove them when they hit 800,000 miles, or the 18th year from the model year.

The other options is the ZEV Milestones Option, which allows fleets to slowly phase in ZEVs over the next 20 years or so based on the vehicle type, and may continue to add ICE vehicles to the California fleet, as long as the ZEV Milestones are being met. If your fleet decides to comply with the ZEV Milestones Option, you can see that day and sleeper cab tractors start on a later timeline, starting in 2027 for day cab tractors and 2030 for sleeper cab tractors, which recognizes the potential range needs for these vehicles and current lack of interstate ZEV fueling options in the early years of this regulation. So you may be able to delay compliance with the regulation for a few years yet if you choose this option, and phase the ZEVs in slowly over time.

We will be posting a fleet calculator on our webpage soon that will help you compare the two options to decide which is best for your fleet.

Whether or not you are subject to High Priority Fleets, if any of your vehicles visit the seaports or intermodal railyards in California, you would be subject to the drayage portion of the regulation. This part has stricter requirements, with a reporting deadline of December 31, 2023 to register any legacy combustion vehicles in the TRUCRS/Drayage reporting system. After that, only ZEVs can be added to the drayage reporting system starting January 1, 2024, and registered combustion legacy vehicles can continue to operate at the ports and railyards (as long as the vehicle visits at least one time per year) until the vehicle reaches the end of its useful life, which is at least 13 years from the model year of the engine, and up to 18 years or 800,000 miles, whichever comes first. Let me know if you are a drayage fleet and I can forward you to the drayage team for further questions about that regulation. See the fact sheet on the drayage regulation at [CARB Fact Sheet: 2023 Advanced Clean Fleets Regulation - Drayage Truck Requirements | California Air Resources Board](#).

From your email signature, I assume you are not a government fleet, so I will leave that information off here.

Let me know if you have followup questions.

Hope this helps!

Disclaimer:

Thank you for the email. The [Second 15-day](#) public comment period for the Advanced Clean Fleets rulemaking is currently open until August 21, 2023. To be considered and addressed in the Final Statement of Reasons, please submit your comment to the electronic docket for this rulemaking by August 21, 2023 (linked below). If you do not wish to have your email considered by the Board and addressed in the Final Statement of Reasons, please let me know.

Note: Written comments will only be considered and responded to on the modifications identified in the [Second 15-day Notice](#).

Electronic Docket: <https://www.arb.ca.gov/lispub/comm/bclist.php>

CARB's Rulemaking Webpage: <https://ww2.arb.ca.gov/rulemaking/2022/acf2022>

Please note that under the California Public Records Act (Gov. Code, § 6250 et seq.) and the California Administrative Procedure Act (Gov Code §11347.3(b)(6)), your email, written comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) submitted to CARB in connection to a rulemaking must be compiled for this rulemaking file and will become part of the public record and may be subject to disclosure to the public upon request.

Chris Franceschi
Air Pollution Specialist

From: Steve Ellsworth <steve.000@ellco.net>

Sent: Wednesday, August 9, 2023 9:21 AM

To: ARB ZEV Fleet <zevfleet@arb.ca.gov>

Subject: 11647 or new 216797

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Our fleet is 100% CNG - ZERO diesel vehicles

How do I report our compliance ?

Kind Regards,

Steve Ellsworth

Steve Ellsworth | President | Ellco Transportation

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