HD/IM Adoption

On behalf of my family and grandchildren I want to thank Chair Randolph and the CARB board for the legacy work to clean up our air. As a child of the 60’s I lived through very poor air quality. Incrementally I have invested thousands of dollars over the years to partner with CARB in reducing vehicle air pollution.

Zero emission vehicles provide us the best choice to deliver the highest air quality to our children. But I fear in the single choice to go electric and the constant assault on near zero emission alternatives overlook the value of biomass liquid fuel as biodiesel, renewable diesel and renewable compressed natural gas which provide significant emission reductions when run in new technology engines. HD/IM will be putting unnecessary burdens on our children and economically challenged. It is these individuals who will be most affected by the unavoidable increases in cost of goods and transportation.

HD/IM as it will be presented today will cripple the movement of goods in CA. and is another layer of regulation in a cornucopia of existing regulations that is unnecessary. The use of existing regulations to monitor and enforce truck operational standards is sufficient.

To replace the estimated 1.6 million HD trucks in CA by 2030 would require 685 trucks a day be produced to meet the 2030 deadline and 256 trucks a day to meet the 2045 requirement. These facts along with our power grid estimated need to be a minimum of 4 times larger than we have today pose a huge challenge ahead for all who value clean air.

I would ask that CARB staff continue to hold additional HD/IM Workshops along with developing a larger pilot study over the next two years to assure that families and freight costs will not become victims of HD/IM. This additional time will allow CARB time to validate studies regarding emissions reduction. Ultimately allowing advanced technology to assist in developing a smoother transition to electric/hydrogen vehicle use.

As a lifelong partner in the development of cleaner air across CA. We have come a long way since the 60’s. The necessity to adapt HD/IM at this time needs more time to mature… to assure the best pathways are chosen and new technologies have time to be implemented.

Thank you

