

RE: ACF Ruling clarification

Korn, Joe <Joe.Korn@holman.com>

Thu 8/17/2023 12:33 PM

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

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Thank you and I guess I have no preference about submitting this so go for it. And this info helps clarify some things for us.

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

Sent: Thursday, August 17, 2023 3:22 PM

To: Korn, Joe <Joe.Korn@holman.com>

Subject: Re: ACF Ruling clarification

EXTERNAL EMAIL

Hi Joe,

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 (even though none of these questions are really directed at our proposed 15-day changes).

To answer your questions:

You mentioned a fact sheet that was to be released for the public. Do you know if that ever got released? And is the target date for the reporting guidelines still late November / December this year?

- Some updated Fact Sheets have been posted at [Advanced Clean Fleets Fact Sheets | California Air Resources Board](#) as well as a fleet calculator tool to compare the Model Year Schedule option against the ZEV Milestones Option for High Priority Fleets. We are still working on other more detailed fact sheets to come, so stay tuned and keep checking that linked website. Reporting guidelines will be out when the reporting system is opened for ACF reporting, still targeting late fall/early winter.

We are getting an extreme amount of questions from our clients and for the most part we have been able to help them, one of the biggest misunderstandings is, if they choose the milestone method, can they still buy ICE vehicles, '24 model year, that are CARB certified in '24? Especially if they were ordered in '23? . I know by 1/1/25, (or '27) they need to meet the 10% threshold, but I assume that would reflect in the reporting?

- For ZEV Milestones, as long as the fleet is meeting the ZEV Milestones, ICE vehicles can be added to the California fleet, regardless of model year. There is a requirement that modifies what ICE vehicles may be added to the California fleet: "ICE Vehicle Additions. Any ICE vehicle added to the California fleet on or after January 1, 2024 must have a 2010 through 2023 model year engine or a 2024 model year or newer engine certified to applicable California emissions standards and emissions related requirements. Any new ICE vehicle added to the California fleet must be certified to applicable California emissions standards and emissions related requirements."
- For calculating the ZEV Milestones, it does not matter when the ICE vehicle was ordered nor the model year, it matters what is in service in the fleet during the calendar year for determining the California fleet size and associated ZEV Milestone.

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: Korn, Joe <Joe.Korn@holman.com>
Sent: Thursday, August 17, 2023 12:05 PM
To: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Subject: RE: ACF Ruling clarification

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Hi Callie,

Hope all is well. Things are hopping around here, and all the buzz is ACF. Question for you; you mentioned a fact sheet that was to be released for the public. Do you know if that ever got released? And is the target date for the reporting guidelines still late November / December this year?

We are getting an extreme amount of questions from our clients and for the most part we have been able to help them, one of the biggest misunderstandings is, if they choose the milestone method, can they still buy ICE vehicles, '24 model year, that are CARB certified in '24? Especially if they were ordered in '23? . I know by 1/1/25, (or '27) they need to meet the 10% threshold, but I assume that would reflect in the reporting?

Please let me know when you can and I look forward to hearing from you.

Sincerely,

Joe