

ACF <> Airport Shuttle Regulation

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Tue 8/15/2023 4:47 PM

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

Cc: Thomas Rocanova <thomas@revolv.us>

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To Whom It May Concern,

I have a question regarding how the Advanced Clean Fleets Regulation interacts with the Zero-Emission Airport Shuttle Regulation. My company is working with a shuttle operator who must comply with the Zero-Emission Airport Shuttle Regulation starting December 31, 2027. However, given their fleet size, they're also a "high priority fleet" as defined by the Advanced Clean Fleets Regulation.

The Final Advanced Clean Fleets Regulation Order states: "Fleet owners that are subject to the Zero-Emission Airport Shuttle Regulation ... may exclude vehicles in their California fleet that are subject to that regulation from the requirements of sections 2015.1 and 2015.2 until January 1, 2027." Sections 2015.1 and 2015.2 outline the Model Year Schedule and Milestone options, respectively.

That said, I'm still unclear on which regulation supersedes the other starting January 1, 2027, and thereafter. Depending on the age and configuration (# of axles impacts which milestone group a bus falls into) of a fleet's shuttle buses, in addition to which ACF compliance option they select, the Zero-Emission Airport Shuttle Regulation may or may not be more aggressive than ACF. It would be much appreciated if you could provide more clarity on this issue.

Please let me know if there is additional information I can provide that will help you with your response.

Thank you,
Adam

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