



Coalition Members

May 28th, 2020

Mary Nichols, Chair
California Air Resources Board
101 I Street
Sacramento, CA 95814

SUBJECT Comments on the Proposed Advanced Clean Trucks Regulation

The Construction Industry would like to offer the following comments on the proposed changes to the draft Advanced Clean Truck Rule.

First, we are disappointed that the staff chose to arbitrarily reduce the size of the fleets required to respond to the survey from 100 vehicles to 50 vehicles.

Second, at the Board hearing we expressed our grave concerns about the intrusive nature of the proposed survey to a business and its operations. These questions will likely be answered with a lot of uncertainty and misinformation, or no reporting at all. We frankly do not know how the results of the survey can be considered credible or useful in creating such a critical regulation.

Third, we also indicated at the Board hearing that that many fleets do not collect or retain the detailed data CARB is requesting for this the survey. If this survey is intended to go out next year with 2020 being used as a basis, with very little outreach, companies will be at a loss as to the specifics of what they will need to gather. More than a majority of companies with revenues of \$50 million are still unaware of this regulation and the imposition placed on their company.

Fourth, there does not seem to be anything in the documents about the costs associated with completing this extensive survey. What was the average time allotted for completion of the survey? How much documentation will be required? How much time will the respondents have to reply once they are notified?

Fifth, completing the survey by April 1, 2021 will be difficult from most fleet owners. Many of these fleets have on-road, off-road, and portable equipment that have reporting deadlines in the first quarter of the year. The survey data needed will take more than a month to gather if it can be obtained at all. The survey should be delayed until September 1, well after all the other reporting deadlines.

Sixth, if the survey is to be done online how will CARB ensure the web database will be secure given the amount of proprietary and confidential information that is being requested?

Finally, we fully expect the focus of any future regulation based upon the results of this survey will be on light to medium duty vehicles, typically running delivery and pick-ups within a generally unvaried radius during the day, and which pose less challenges with



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electric vehicle substitution, like those used in construction, including rental vehicles, such as dump trucks, water trucks and service vehicles, serving the construction industry.

Our industry is already under severe and costly deadlines to convert their fleets to the newest, lowest emitting equipment available. It is unrealistic to now expect that an entirely new technology can be adapted to convert an industry that has just spent billions to comply with current CARB rules for On-Road, Off-Road and Portable equipment.

Sincerely,

A handwritten signature in black ink that reads "Michael W. Lewis". The signature is written in a cursive, flowing style.

Michael Lewis
Executive Vice President
Construction Industry Air Quality Coalition