

## Re: Request to be a member of TRAC

Franceschi, Chris@ARB <chris.franceschi@arb.ca.gov>

Wed 8/16/2023 11:27 AM

To: Mary Rancier <RancierM@agc-ca.org>; Brian Mello <MelloB@agc-ca.org>; Tresten Keys <KeysT@agc-ca.org>

Cc: Brasil, Tony@ARB <Tony.brasil@arb.ca.gov>; Duehring, Craig@ARB <craig.duehring@arb.ca.gov>; Tuter, Bruce@ARB <bruce.tuter@arb.ca.gov>; Rodgers, Annmarie@ARB <annmarie.rodgers@arb.ca.gov>; Berumen, Gerald@ARB <gerald.berumen@arb.ca.gov>; Arneja, Paul@ARB <Paul.Arneja@arb.ca.gov>; Levine, Johanna@ARB <johanna.levine@arb.ca.gov>

OK thank you!

### Chris Franceschi

Air Pollution Specialist, Transportation and Clean Technology Branch  
California Air Resources Board

[Chris.Franceschi@arb.ca.gov](mailto:Chris.Franceschi@arb.ca.gov) (916)-322-6156

[Advanced Clean Trucks](#)

[Advanced Clean Fleets](#)

---

**From:** Mary Rancier <RancierM@agc-ca.org>

**Sent:** Wednesday, August 16, 2023 11:16 AM

**To:** Franceschi, Chris@ARB <chris.franceschi@arb.ca.gov>; Brian Mello <MelloB@agc-ca.org>; Tresten Keys <KeysT@agc-ca.org>

**Cc:** Brasil, Tony@ARB <Tony.brasil@arb.ca.gov>; Duehring, Craig@ARB <craig.duehring@arb.ca.gov>; Tuter, Bruce@ARB <bruce.tuter@arb.ca.gov>; Rodgers, Annmarie@ARB <annmarie.rodgers@arb.ca.gov>; Berumen, Gerald@ARB <gerald.berumen@arb.ca.gov>; Arneja, Paul@ARB <Paul.Arneja@arb.ca.gov>; Levine, Johanna@ARB <johanna.levine@arb.ca.gov>

**Subject:** RE: Request to be a member of TRAC

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Hi, Chris,

Thank you for your prompt and informative response; it is greatly appreciated! Yes, we would like our email and associated documents available in the public comment docket. We look forward to the meeting on the 22<sup>nd</sup> and will see you there.

### Mary Alyssa Rancier

**Policy Manager**

AGC of California

Office: 916.371.2422

Mobile: 916.291.1899

[rancierm@agc-ca.org](mailto:rancierm@agc-ca.org)

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**From:** Franceschi, Chris@ARB <chris.franceschi@arb.ca.gov>

**Sent:** Wednesday, August 16, 2023 11:03 AM

**To:** Mary Rancier <RancierM@agc-ca.org>; Brian Mello <MelloB@agc-ca.org>; Tresten Keys <KeysT@agc-ca.org>

**Cc:** Brasil, Tony@ARB <Tony.brasil@arb.ca.gov>; Duehring, Craig@ARB <craig.duehring@arb.ca.gov>; Tuter, Bruce@ARB <bruce.tuter@arb.ca.gov>; Rodgers, Annmarie@ARB <annmarie.rodgers@arb.ca.gov>; Berumen, Gerald@ARB <gerald.berumen@arb.ca.gov>; Arneja, Paul@ARB <Paul.Arneja@arb.ca.gov>; Levine, Johanna@ARB <johanna.levine@arb.ca.gov>

**Subject:** Re: Request to be a member of TRAC

Hi Mary, Brian, and Trestan,

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 and associated attachments submitted to our ACF comment docket as a comment on the proposed 15-day changes. I will need a response from you if not, 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:

- Thank you for your attachment with suggestions on the meeting format for industry collaboration meetings. As this is just the kickoff meeting, we will discuss the format of future TRAC meetings at the meeting on August 22.

We also wanted to make sure that we will be a formal TRAC member – what does that process entail?

- We have not determined this process, and will discuss it with the group at the first meeting.

Lastly, I noticed that there is already a TRAC for the Truck & Bus Regulation – is this is the same TRAC, or will it be a different group?

- This is a different TRAC meeting; the Truck and Bus TRAC was formed, met, and has served its purpose in the early years of implementation of the Truck and Bus regulation.

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, Transportation and Clean Technology Branch

California Air Resources Board

[Chris.Franceschi@arb.ca.gov](mailto:Chris.Franceschi@arb.ca.gov) (916)-322-6156

[Advanced Clean Trucks](#)

[Advanced Clean Fleets](#)

---

**From:** Levine, Johanna@ARB <[johanna.levine@arb.ca.gov](mailto:johanna.levine@arb.ca.gov)>

**Sent:** Wednesday, August 16, 2023 10:45 AM

**To:** Berumen, Gerald@ARB <[gerald.berumen@arb.ca.gov](mailto:gerald.berumen@arb.ca.gov)>; Franceschi, Chris@ARB <[chris.franceschi@arb.ca.gov](mailto:chris.franceschi@arb.ca.gov)>; Arneja, Paul@ARB <[Paul.Arneja@arb.ca.gov](mailto:Paul.Arneja@arb.ca.gov)>

**Cc:** Brasil, Tony@ARB <[Tony.brasil@arb.ca.gov](mailto:Tony.brasil@arb.ca.gov)>; Duehring, Craig@ARB <[craig.duehring@arb.ca.gov](mailto:craig.duehring@arb.ca.gov)>; Tuter, Bruce@ARB <[bruce.tuter@arb.ca.gov](mailto:bruce.tuter@arb.ca.gov)>; Rodgers, Annmarie@ARB <[annmarie.rodgers@arb.ca.gov](mailto:annmarie.rodgers@arb.ca.gov)>

**Subject:** RE: Request to be a member of TRAC

Thanks!

---

**From:** Berumen, Gerald@ARB <[gerald.berumen@arb.ca.gov](mailto:gerald.berumen@arb.ca.gov)>

**Sent:** Wednesday, August 16, 2023 10:42 AM

**To:** Levine, Johanna@ARB <[johanna.levine@arb.ca.gov](mailto:johanna.levine@arb.ca.gov)>; Franceschi, Chris@ARB <[chris.franceschi@arb.ca.gov](mailto:chris.franceschi@arb.ca.gov)>; Arneja, Paul@ARB <[Paul.Arneja@arb.ca.gov](mailto:Paul.Arneja@arb.ca.gov)>

**Cc:** Brasil, Tony@ARB <[Tony.brasil@arb.ca.gov](mailto:Tony.brasil@arb.ca.gov)>; Duehring, Craig@ARB <[craig.duehring@arb.ca.gov](mailto:craig.duehring@arb.ca.gov)>; Tuter, Bruce@ARB <[bruce.tuter@arb.ca.gov](mailto:bruce.tuter@arb.ca.gov)>; Rodgers, Annmarie@ARB <[annmarie.rodgers@arb.ca.gov](mailto:annmarie.rodgers@arb.ca.gov)>

**Subject:** FW: Request to be a member of TRAC

Hi Johanna

I'm looping in the ACF team as these appear to be written comments for the ACF 15-day comment period and we have to follow protocol on our responses.

Thanks



Jerry Berumen  
Manager  
On-Road Compliance Assistance Section  
Mobile Source Control Division  
916.282.6267

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**From:** Levine, Johanna@ARB <[johanna.levine@arb.ca.gov](mailto:johanna.levine@arb.ca.gov)>  
**Sent:** Wednesday, August 16, 2023 10:39 AM  
**To:** Berumen, Gerald@ARB <[gerald.berumen@arb.ca.gov](mailto:gerald.berumen@arb.ca.gov)>  
**Subject:** FW: Request to be a member of TRAC

Hi Jerry-  
I received the email below from Mary. Can you assist her?  
Johanna

---

**From:** Mary Rancier <[RancierM@agc-ca.org](mailto:RancierM@agc-ca.org)>  
**Sent:** Wednesday, August 16, 2023 9:24 AM  
**To:** Levine, Johanna@ARB <[johanna.levine@arb.ca.gov](mailto:johanna.levine@arb.ca.gov)>; Brian Mello <[MelloB@agc-ca.org](mailto:MelloB@agc-ca.org)>; Tresten Keys <[KeysT@agc-ca.org](mailto:KeysT@agc-ca.org)>  
**Subject:** FW: Request to be a member of TRAC

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Hi, Johanna,

We have sent a couple emails to CARB staff regarding the meeting on August 22<sup>nd</sup> to discuss the formation of the Truck Regulatory Advisory Committee (TRAC) – please see below. We received a kickback email from Bruce saying that he would be out of the office until August 21<sup>st</sup>, but desire to have a response prior to that if possible. Could you please forward our email to the appropriate staff?

Additionally, going forward, [@Brian Mello](#) and [@Tresten Keys](#) will be leading this effort. We look forward to working closely with CARB on this effort.

Thank you,

**Mary Alyssa Rancier**

**Policy Manager**

AGC of California

Office: 916.371.2422

Mobile: 916.291.1899

[rancierm@agc-ca.org](mailto:rancierm@agc-ca.org)

[www.agc-ca.org](http://www.agc-ca.org)

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**From:** Mary Rancier  
**Sent:** Wednesday, August 16, 2023 9:17 AM  
**To:** [trac@arb.ca.gov](mailto:trac@arb.ca.gov)  
**Cc:** Tresten Keys <[KeysT@agc-ca.org](mailto:KeysT@agc-ca.org)>; Brian Mello <[MelloB@agc-ca.org](mailto:MelloB@agc-ca.org)>  
**Subject:** FW: Request to be a member of TRAC

Hello, TRAC Industry Liaison,

I hope you are doing well. AGC of California has been a key stakeholder for the Advanced Clean Fleets regulation; we have submitted numerous written and verbal comments on behalf of our contractor members. Please see attached for the comment letter we submitted May 5<sup>th</sup> that urges CARB to create an implementation working group, suggestions on how it could be formed, as well as a request to be in the group. Also, please see attached for the comment letter we submitted August 1<sup>st</sup> where we provide some questions that can be incorporated in future FAQ documents as well as thanking CARB for creating TRAC and our hope to be a part of the group.

We received a notice for a meeting to discuss the formation of a Truck Regulatory Advisory Committee (TRAC) held on August 22<sup>nd</sup>. We plan to be in attendance, however, we also wanted to make sure that we will be a formal TRAC member – what does that process entail?

Lastly, I noticed that there is already a TRAC for the Truck & Bus Regulation – is this is the same TRAC, or will it be a different group?

Thank you,

**Mary Alyssa Rancier**

**Policy Manager**

AGC of California

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---

**From:** Mary Rancier  
**Sent:** Wednesday, August 16, 2023 9:14 AM  
**To:** 'btuter@arb.ca.gov' <[btuter@arb.ca.gov](mailto:btuter@arb.ca.gov)>  
**Cc:** Brian Mello <[MelloB@agc-ca.org](mailto:MelloB@agc-ca.org)>; Tresten Keys <[KeysT@agc-ca.org](mailto:KeysT@agc-ca.org)>  
**Subject:** Request to be a member of TRAC

Hello, Bruce,

I hope you are doing well. AGC of California has been a key stakeholder for the Advanced Clean Fleets regulation; we have submitted numerous written and verbal comments on behalf of our contractor members. Please see attached for the comment letter we submitted May 5<sup>th</sup> that urges CARB to create an implementation working group, suggestions on how it could be formed, as well as a request to be in the group. Also, please see attached for the comment letter we submitted August 1<sup>st</sup> where we provide some questions that can be incorporated in future FAQ documents as well as thanking CARB for creating TRAC and our hope to be a part of the group.

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**Mary Alyssa Rancier**

**Policy Manager**

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Peter Tateishi  
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Submitted electronically: [executive.officer@arb.ca.gov](mailto:executive.officer@arb.ca.gov); [cotb@arb.ca.gov](mailto:cotb@arb.ca.gov); [mscd@arb.ca.gov](mailto:mscd@arb.ca.gov); and [abrasil@arb.ca.gov](mailto:abrasil@arb.ca.gov)

May 5, 2023

**RE: Implementation Working Group Feedback Requested from Executive Officer Steven Cliff.**

Dear CARB Staff,

On behalf of the Associated General Contractors (AGC) of California and the California Construction and Industrial Materials Association (CalcIMA), we are submitting feedback to the California Air Resources Board (CARB) regarding the development of an Implementation Working Group (IWG) for the Advanced Clean Fleet (ACF) Regulation.

AGC of California is a member-driven organization that statewide consists of over 900 companies. Our members provide commercial construction services, many of which own or operate 50 or more vehicles in their fleets. We believe the construction industry is vital to the success of California. Together, our members actively create opportunities to build and strengthen our state. We are passionate about shaping policy, improving industry relationships, and developing our workforce.

CalcIMA is the statewide voice of the construction and industrial materials industry. With over 500 local plants and facilities throughout the state, producing aggregate, concrete, cement, asphalt, industrial minerals, and precast construction products, our members produce the materials that build our state's infrastructure, including public roads, rail, and water projects; homes, schools and hospitals; assist in growing crops and feeding livestock; and play a key role in manufacturing consumer products as well, including roofing, paint, low-energy light bulbs, and battery technology for electric cars and windmills. The continued availability of our members' materials is vital to California's economy, as





well as ensuring California meets its renewable energy, affordable housing, and infrastructure goals.

AGC of California and CalcIMA appreciates the opportunities to submit comments that CARB has provided throughout the ACF rulemaking process, such as the numerous workshops, working groups, individual meetings, and board hearings. On Tuesday, April 25, 2023, we met with Executive Officer Steven Cliff to discuss construction industry concerns. During this meeting we expressed the need for an IWG and were asked to provide feedback on what we believe the IWG should look like.

Additionally, due to the complexity of this regulation, we recognize the need for continuous training to ensure compliance. AGC of California and CalcIMA would like to partner with CARB and host compliance trainings on our Learning Management System (LMS) software. Please read below for additional information.

### 1. Implementation Working Group

AGC of California and CalcIMA would be honored to be a part of the proposed Advanced Clean Fleet (ACF) Implementation Working Group (IWG), specifically, to represent commercial construction contractors and the construction materials producers. Due to our 900+ members, we are able to provide perspectives from a large variety of commercial contractors that vary in size and scope, ranging from small-scale family-owned businesses to nationwide contractors. Please read below for our suggested model for an ACF IWG:

- **Purpose**
  - To support successful implementation of the 'Advanced Clean Fleet' regulation.
- **Make-up**
  - Industry experts from all industries this regulation will impact (i.e. construction, utility, drayage, etc).
  - Local government agencies.
- **Method**
  - Facilitation of communication with CARB and its stakeholders to obtain feedback on implementation and implementation tools for this regulation. This group would aim to help CARB fine tune outreach, training, and implementation materials, and provide a mechanism for stakeholders to discuss other implementation issues.
- **Structure**
  - Meetings occur 3-4 times a year;
  - Report outcomes and findings to the CARB Governing Board annually;
  - Provide feedback on CARB's training presentations, handouts, flyers and factsheets;
  - Review and provide feedback on CARB's reporting and compliance planning tools;
  - Review and provide feedback on advisories and guidance documents developed by CARB; and
  - Address other issues regarding regulation implementation.



## 2. Compliance Trainings

In addition to the development of an IWG, AGC of California recognize that training and education will be an important component to ensure compliance and the success of this regulation. AGC of California is proposing that we develop a mutually beneficial partnership where we will provide a Learning Management System (LMS) to house compliance trainings so that it is available on-demand to accommodate the busy schedules of contractors. This can be accomplished by recording a single training session, as well as develop assignments or other interactive material for attendees to access online. AGC of California is willing to accept all the administrative obligations this may require. This includes, but not limited to course creation in the LMS, tracking enrollment, and administering certifications if the participant successfully completes the course. We can select staff from CARB as instructors so that they may have full access to the course and make changes as needed. This is expected to reduce the administrative load of CARB staff. Additionally, the flexible nature of utilizing the LMS for the training may also increase participation by allowing individuals to take the course when it may otherwise not be available, such as weekends and holidays. We would like to schedule a meeting to discuss this further in more detail.

## Conclusion

All in all, AGC of California and CalcIMA appreciate CARB for reading this letter. We encourage CARB to deeply consider our proposal regarding the Implementation Working Group and compliance training. If you have any questions regarding our comments, please contact Brian Mello at 603-770-9264 (email: [mellob@agc-ca.org](mailto:mellob@agc-ca.org)). We appreciate the opportunity to comment and hope to collaborate further.

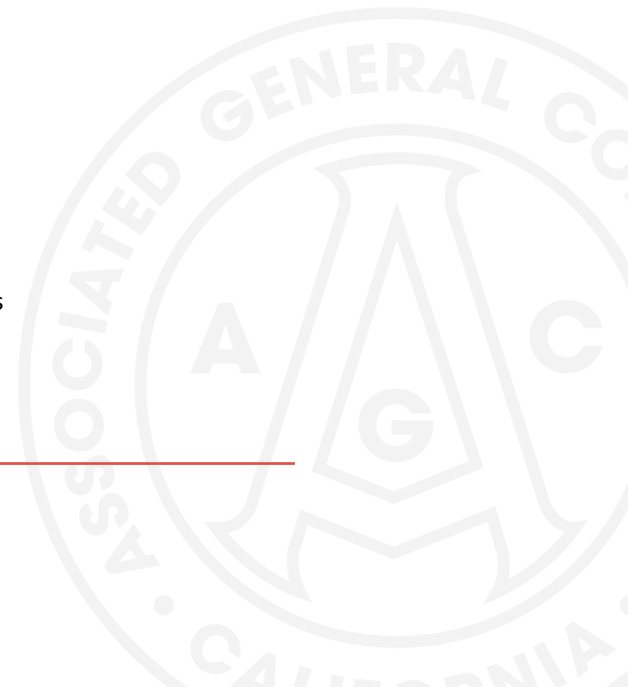
Sincerely,

A handwritten signature in black ink that reads "Brian Mello".

Brian Mello  
Associate Vice President of Engagement & Regulatory Affairs  
Associated General Contractors of California

A handwritten signature in blue ink that reads "Suzanne Seivright".

Suzanne Seivright  
Director of Regional Governmental Affairs and Grassroots Operations  
California Construction and Industrial Materials Association





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1001 I Street  
Sacramento, CA 95814

Submitted electronically to CARB's Clerk of the Board: [cotb@arb.ca.gov](mailto:cotb@arb.ca.gov)

August 1, 2023

**RE: Questions Pertaining to Advanced Clean Fleets (ACF) Regulation: High Priority and Federal Fleet Requirements.**

Dear Executive Officer Steven Cliff and CARB Staff,

On behalf of the Associated General Contractors (AGC) of California, and the undersigned organizations, we are submitting questions to the California Air Resources Board (CARB) in response to Advanced Clean Fleets Regulation, specifically regarding the High Priority and Federal Fleet requirements.

AGC of California is a member-driven organization that statewide consists of over 900 companies. Our members provide commercial construction services, many of which own or operate 50 or more vehicles in their fleets. We believe the construction industry is vital to the success of California. Together, our members actively create opportunities to build and strengthen our state. We are passionate about shaping policy, improving industry relationships, and developing our workforce.

We greatly appreciate CARB allowing AGC of California, and the undersigned organizations to be involved in the rulemaking process of the ACF regulation. Our industry expressed several questions that need to be addressed to ensure proper compliance with the regulation. We would like to encourage CARB to consider adding the following questions to the Frequency Asked Questions document currently in development and answer the questions accordingly. Additionally, we assert CARB to develop an Implementation Working Group (IWG) so that feedback between the agency and trade associations is consistently considered. An IWG would foster mutual understanding and result in an increased compliance rate.



## 1) Applicability.

The regulatory language states that “this regulation applies to any entity that owns, operates, or directs the operation of one or more vehicles specified in section 2015(a)(2)” (page 3). Additionally, section 2015(a)(2) states that “vehicles subject to this regulation are vehicles that: have a gross vehicle weight rating (GVWR) greater than 8,500 lbs., are light-duty package delivery vehicles, or are yard tractors, and that are operated in California (page 3).

- **If a company has 50 vehicles within their fleet but only one of the vehicles meet the vehicle scope requirements (i.e. are 8,500 lbs or heavier); does this mean that the company would be applicable to this regulation?**

We assert that the above language contradicts the Initial Statement of Reasons (ISOR) that state high priority and federal fleet requirements applies to “[a]ny fleet owner who owns, operates, or directs 50 or more Class 2b-8 vehicles or off-road yard tractors including vehicles under common ownership and control, that operates at least 1 vehicle in California”. The ISOR indicates that the 50+ vehicles in one’s fleet must meet the vehicle scope requirements to be applicable, therefore, the language should reflect as such.

The regulatory language states that a fleet would be subject to the ACF if it “Is an entity that has \$50 million or more in total gross annual revenues, including revenues from all subsidiaries, subdivisions, and branches, reported to the United States Internal Revenue Service, or its equivalent in another country in the calendar year immediately preceding the prior to the current calendar year” (page 3).

- **How are subsidiaries and parent companies counted?**

For example, let’s say a Contractor Parent Company X earns \$49 million on their own books but owns 2 subsidiary companies. Subsidiary 1 and Subsidiary 2 both make \$1 million. **Does this mean that the parent company and/or subsidiaries are now subject to the rule?**

Additionally, the language states that a fleet would be subject to the ACF if it “Is a fleet owner that owns, operates, or directs the operation of 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles” (page 3).

- **Does the total fleet include zero-emission vehicles that are not medium/heavy duty, such as the Tesla Model S?**

We understand that vehicles permanently added or removed to a California fleet must be reported to CARB within 30 days. However, **does that mean if the fleet went from below the 50-vehicle threshold to above the threshold, will they be subject to the rule the year those changes were made or the following year?** Please read the following three scenarios for specific examples.



Scenario 1: Fleet has 49 vehicles in January, sells 1 vehicle in March, and then buys 1 vehicle in April.

- **Does this count as 50? Will the fleet need to comply with ACF the same year these changes were made or the following year?**

Scenario 2: Fleet has 50 vehicles in January then sells 1 vehicle in March.

- **Will this fleet need to comply with the ACF this whole year even though they went from 50 to 49 vehicles?**

Scenario 3: Contractor Parent Company X has 0 vehicles in their fleet but owns 2 subsidiary companies. Subsidiary 1 and Subsidiary 2 both have 25 vehicles.

- **Is the parent company and/or subsidiaries now subject to the ACF?**

Lastly, the language states that a fleet would be subject to the ACF if it “Is a fleet owner or a controlling party whose fleet in combination with other fleets operated under common ownership and control totals 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles” (page 3). A controlling party is defined as “a motor carrier, broker, or entity that directs or otherwise manages the day-to-day operation of one or more vehicles under its common ownership or control to serve its customers or clients” (page 5).

- **What happens in a 50/50 ownership split? Who in this case would be considered the controlling party?**

## 2) Corporate Joint Venture Option.

- **How is the 50 million total gross revenue or 50 or more vehicle total counted for joint ventures?**
  - **Do the vehicles and revenue need to be owned and accrued by the JV itself or by the individual partners that make up the JV?**
    - **If one partner of the JV qualifies for the rule on their own but the others do not, does the rule apply?**

## 3) Implementation Process.

AGC of California, and the undersigned organizations would like to assert that CARB includes various trade organizations and relevant construction labor unions in the process of developing documents and other aspects of implementation. We understand that CARB recently announced a meeting to discuss the formation of a Truck Regulatory Advisory Committee (TRAC) for August 22, 2023. We thank CARB for creating this meeting in response to the comment letter that was submitted to the Clerk of the Board on May 5, 2023. In response to CARB’s notice for TRAC, AGC of California and the undersigned organizations reassert the need and desire to be a part of the TRAC. We provided the purpose, make-up, method, and structure of such group and believe it will



be beneficial in assisting CARB with the implementation process.

## Conclusion

All in all, there are many uncertainties and questions that surround the Advanced Clean Fleets regulation. AGC of California urges the California Air Resources Board (CARB) to consider adding the above-mentioned questions to their FAQ document currently in development along with their associated answers. If you have any questions regarding our comments, please contact Brian Mello at 603-770-9264 (email: [mellob@agc-ca.org](mailto:mellob@agc-ca.org)). We appreciate the opportunity to comment and hope these questions are addressed.

Sincerely,

Brian Mello  
Associate Vice President of Engagement & Regulatory Affairs  
Associated General Contractors of California

on behalf of,

Suzanne Seivright, California Construction and Industrial Materials Association  
Mike Lewis, Construction Industry Air Quality Coalition  
Jon Switalski, Rebuild SoCal Partnership  
Manny Leon, California Alliance for Jobs  
Robert Dugan, California Construction & Industrial Material Association  
Emily Cohen, United Contractors  
Clayton Miller, Southern California Contractors Association  
Los Angeles County Business Federation

