



October 17, 2022

Chair Liane Randolph  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95814

Subject: Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph and Board Members:

We write to you today to express our deep concern with the California Air Resources Board's (CARB) impending ruling on the proposed Advanced Clean Fleets regulation package. This proposal poses serious implementation problems and threatens to raise costs for consumers and devastate local businesses at the worst possible time.

Just last month, Californians across our state were told to power down their electronics and avoid charging their electric vehicles to avert a catastrophic blackout across our grid. Fortunately, thanks to the sacrifices of millions of Californians, the worst-case scenario was avoided. Yet, the growing electrification of our grid makes close-calls like this more likely, not less. If adopted, ACF would exacerbate the problem by adding thousands more big rigs to the grid that require a tremendous amount of power to operate. This would come at the exact same time the California Energy Commission is projecting regular capacity shortfalls well into the 2020s. Increasing demand and lack of supply are not compatible.

Moreover, every single one of our districts rely on California's goods movement sector for the shipment of vital products: food, baby formula, diapers. Ultimately, at some stage, these products rely on commercial trucking to get to store shelves. An aggressive mandate (like ACF) to transition to zero emission trucks could threaten the timely delivery of these essential products. If the grid is unable to support the charging required by electric trucks, communities may be forced to go without necessities for an indefinite period of time.

This, of course, assumes there is charging infrastructure readily available in the first place. The Energy Commission's inaugural AB 2127 report laid bare that California was behind in constructing the

charging infrastructure necessary to support growing vehicle electrification. Furthermore, the Commission's SB 1000 report, unsurprisingly, found that our low-income and rural communities have the least charging coverage. These communities should have their ready access to essential goods conditioned on the State's ability to construct chargers.

Finally, even if the grid has the capacity and infrastructure to regularly support the changing needs of heavy-duty trucks, ACF does not adequately contemplate the host of inherent limitations that accompany the aggressive deployment of zero emission trucks. The trucks on (or coming to) the market do not have the capability to support the needs of a 21st century trucking industry. Electric big rigs do not have the battery capacity, the range, nor the charging efficiency to meet the needs of today's fast-paced trucking industry. Technological improvements may solve these limitations in the future, but the reality is the limitations exist today.

More broadly, beyond these practical implementation issues posed by ACF, this regulatory package is also poised to raise costs and devastate local businesses across our state.

California is in the midst of an ongoing affordability crisis. Too often, our constituents are forced to make difficult, if not impossible, financial choices. A looming economic slowdown, unprecedented inflationary pressure, and an ongoing supply chain crisis continue to burden our constituents.

In truth, long before the pandemic, California was becoming increasingly unaffordable for many Californians thanks in large part to growing regulations and mandates. The economic difficulties brought on by the pandemic have only exacerbated the problem. Ultimately, these factors make now the wrong time to implement a far-reaching and costly new mandate like ACF.

Electric big rig trucks cost multiple times more than their current diesel counterparts. And make no mistake about it, these costs will ultimately be borne by consumers across California. Trucking companies will turn to price increases to afford the increased capital costs required by zero emission trucks. These increases will trickle down to all Californians (including our most vulnerable communities), who will once again be on the hook for bankrolling California's climate mandates.

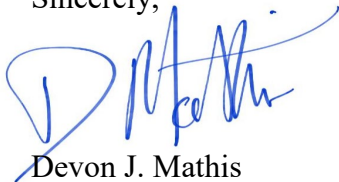
The ACF further threatens to devastate an entire industry characterized by family-owned, small businesses. CARB's own analysis of the proposed ACF regulation openly acknowledges that, if approved, the regulation could lead to the elimination of businesses including, "gasoline stations and vehicle repair businesses".

It may be easy for CARB to cast aside the needs of these Californians, but we refuse to: They represent our neighbors and their livelihoods. In many cases they are minority owned small businesses that have been around for generations and have become cornerstones of their communities. Their concerns must be front and center in this process, not buried away in reports.

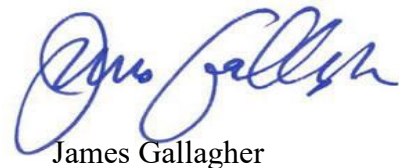
In the final analysis, the proposed ACF package arrives at the wrong time for Californians. As the economic outlook darkens, the State must be sensitive to the burdens facing our constituents. Moreover, with serious practical issues complicating the widespread of zero emission trucks, moving hastily could seriously disrupt the goods movement industry and contribute to higher costs.

There is much talk around California of a “just transition” away from a fossil fuel-based economy. The ACF regulatory package does not represent a just transition. It forces too many Californians (both consumers and small businesses) to shoulder the ultimate costs for onerous and expensive new mandates. For these reasons, we respectfully urge you to reject the Advanced Clean Fleets Rule.

Sincerely,



Devon J. Mathis  
Assemblymember, 26<sup>th</sup> District



James Gallagher  
Assembly Republican Leader  
Assemblymember, 3<sup>rd</sup> District




Jim Patterson  
Assemblymember, 23<sup>rd</sup> District



Vince Fong  
Assemblymember, 34<sup>th</sup> District



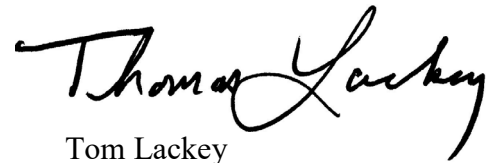
Thurston “Smitty” Smith  
Assemblymember, 33<sup>rd</sup> District



Kelly Seyarto  
Assemblymember, 67<sup>th</sup> District



Megan Dahle  
Assemblymember, 1<sup>st</sup> District



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Assemblymember, 71<sup>st</sup> District