

Congress of the United States
Washington, DC 20515

September 26, 2024

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Regan,

We strongly oppose the California Air Resources Board's (CARB) waiver request for the Advanced Clean Fleets (ACF) rule. While we support efforts to reduce emissions and improve air quality, we believe this waiver is unjustified and could have significant negative impacts on our economy and the livelihoods of many Californians. This one-size-fits-all approach makes it more difficult to pursue alternatives, such as renewable diesel, which offer environmental benefits that are comparable to battery-electric technology at a substantially lower cost.¹

During the public comment period, several industry representatives voiced their concerns about the feasibility and economic impact of the ACF rule. Some reasons they laid out include:

- **Lack of Infrastructure.** Current infrastructure is insufficient to support the widespread adoption of zero-emission vehicles (ZEVs). Fully electrifying the U.S. commercial truck fleet would require a staggering \$1 trillion investment.² Additionally, the American Transportation Research Institute revealed that electrifying the nation's passenger and commercial vehicles would consume more than 40% of the power generated today. California alone would need to increase power generation by 57.2% to support a fully electric vehicle fleet.³ Utilities are nowhere near ready to supply this amount of power, as evidenced by regulations approved by the California Public Utilities Commission (PUC) this month that would give electric companies up to nine years in some cases to connect new EV chargers to the grid.⁴
- **Efficiency and Practicality.** A clean diesel truck has a range of 1,200 miles, and drivers can top off their tanks in 15 minutes at service stations located in virtually every community. By contrast, long-haul battery-electric trucks have a range of approximately

¹ 1. "New ATRI Research Evaluates Renewable Diesel as an Alternative Pathway to Decarbonization," American Transportation Research Institute, April 23, 2024.

² 1. "New Report Pegs Cost of Electrifying U.S. Commercial Truck Fleet at \$1 Trillion," American Trucking Associations, March 19, 2024.

³ 1. "New ATRI Research Evaluates Charging Infrastructure Challenges for the U.S. Electric Vehicle Fleet," American Transportation Research Institute, December 6, 2022.

⁴ 1. Mike Lee, "It Could Take Years to Power up California's New EV Charging Stations," PoliticoPro, September 13, 2024.

150-330 miles and can take up to 10 hours to charge—if a driver can find a charger that is available and functional. Additionally, due to their lithium-ion batteries, Class 8 battery-electric trucks can weigh approximately 16,000 lbs. more than an equivalent truck with a clean diesel powertrain. Since commercial motor vehicles must adhere to a strict federal weight limit of 80,000 lbs., the reduced payload capacity would require more trucks on the road to haul the same amount of freight, increasing traffic and negating environmental benefits.⁵

- **Disruptions to the Agricultural Supply Chain.** The transition to ZEVs would result in higher transportation costs for the food supply chain, ultimately pressuring and increasing prices for consumers. Agricultural producers in California frequently utilize the full 80,000-pound truck weight limit previously mentioned. For these producers to stay in business, they will be forced to undertake huge investments in both fleet changes and charger builds – investments that will reach the millions of dollars and are ultimately dependent on outside third parties and timelines that are outside their control. This is particularly concerning given the current economic challenges faced by our agricultural sector.

This waiver request comes at a time when costs remain high across the board and many Americans are already struggling to put food on the table. Given these significant concerns, we urge the EPA to deny CARB’s waiver request.

Thank you for your consideration.

Sincerely,



David G. Valadao
Member of Congress



Ken Calvert
Member of Congress



Kevin Kiley
Member of Congress



Young Kim
Member of Congress

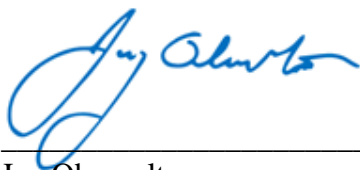
⁵ 1. “A Heavy Dose of Reality for Electric-Truck Mandates,” American Trucking Associations, April 19, 2023.



Doug LaMalfa
Member of Congress



Tom McClintock
Member of Congress



Jay Obernolte
Member of Congress



Michelle Steel
Member of Congress



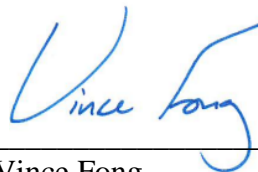
John Duarte
Member of Congress



Mike Garcia
Member of Congress



Darrell Issa
Member of Congress



Vince Fong
Member of Congress