To: California Air Resources Board

From: Quinn Rickert PO Box 89 Palo Cedro, CA 96073

Date: August 15, 2025

Subject: Support for ACF Amendments Implementing AB 1594 and LCFS HRI Changes

Dear Chair and Members of the Board:

I am writing to express my strong support for the proposed amendments to the Advanced Clean Fleets (ACF) regulation and the changes to the Low Carbon Fuel Standard (LCFS).

We are all too familiar with the increasing threats of wildfires, earthquakes, and severe weather. When disaster strikes, we depend entirely on utility crews to respond immediately. These crews are first responders, and they must have reliable, specialized equipment to perform difficult work in often dangerous conditions.

I support the proposed amendments implementing AB 1594 because they provide necessary, common-sense flexibility. The current regulation's rigid 13-year replacement schedule seems unrealistic for the heavy-duty vehicles used to repair power lines or broken water mains. These vehicles are used heavily and wear out quickly. We cannot afford to have utility crews relying on worn-out, unreliable equipment during an emergency simply because an arbitrary date has not yet passed. Allowing utilities to replace vehicles based on their actual usage (like mileage or engine hours) is essential for public safety.

Furthermore, we must be pragmatic. If a zero-emission truck is not yet capable of handling the demands of restoring power in remote areas or during prolonged outages, utilities must be allowed to use the equipment that *can* get the job done. I appreciate the streamlining of the exemption process for these specific situations.

Finally, I support the amendments to the LCFS that encourage Hydrogen Refueling Infrastructure. It seems clear that battery-electric technology may not be feasible yet for the largest, heaviest-duty trucks. We should support alternatives like hydrogen to ensure these critical jobs can transition.

These amendments strike the right balance, without jeopardizing the safety and reliability of our essential services when we need them most. I urge the Board to adopt the proposed changes.

Sincerely,

Quinn Rickert