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September 12, 2025

Clerk of the Board
California Air Resources Board
1001 I St.
Sacramento, CA 95814

Submitted electronically.

RE: Proposed Repeal of the Advanced Clean Fleets Regulation

Dear Chair Randolph and Members of the Board:

Thank you for the opportunity to comment on the Proposed Repeal of the Advanced Clean Fleets Regulation.

On April 25th, 2025 the California Air Resources Board (CARB) and the California Trucking Association (CTA) filed a joint stipulation and request to hold proceedings in *California Trucking Ass'n v. Cliff* (2023) in abeyance pending the repeal of the High-Priority Fleet and Drayage Fleet Requirements of the Advanced Clean Fleets Regulation to avoid wasting party and judicial resources.

We appreciate the continued coordination on this matter and strongly urge the Board to approve staff's proposal.

Our members remain at the forefront of testing and deployment of zero-emission trucks (ZET) and infrastructure. Significant barriers related to cost, infrastructure, weight and range remain in addition to new policy considerations on energy affordability and the growth of competing large load use cases which will further complicate rapid deployment of transmission and distribution.

As you know, both CTA and the American Trucking Associations have a longstanding record of engaging with CARB regulatory processes, working to ensure such regulations are reasonable and implementable and we expect to continue this work moving forward.

Thank you,



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