

Ed Staub and Sons Petroleum (Jason Cole)

Public Comment – CARB ACF / LCFS 15-Day Modifications

I am a fuel distributor with over 20 years of experience serving retail and fleet customers in the western United States. I am submitting comments on the proposed 15-day modifications to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard (LCFS) regulations.

Regulatory Cost Transparency and Timing Misalignment

The continued use of rolling amendments to the ACF and LCFS regulations imposes real and recurring costs on regulated entities, yet those costs are not being transparently disclosed or quantified.

Each amendment cycle—including the current 15-day modifications—forces businesses to:

- * Reevaluate compliance strategies
- * Delay or revise capital investments
- * Reassess fleet procurement timelines
- * Incur internal and external compliance costs

These are direct financial burdens that compound with each regulatory revision.

At the same time, these repeated amendments underscore a fundamental issue: the ZEV market and supporting infrastructure are not developing on the regulatory timeline being imposed.

CARB's need to continually adjust requirements, delay timelines, and expand flexibility provisions is itself evidence that:

- * Vehicle availability is still constrained
- * Infrastructure deployment is incomplete
- * Operational feasibility remains unresolved

Specific Request for CARB Action

I respectfully request that CARB:

1. Disclose Amendment-Specific Cost Impacts

Provide a clear, itemized accounting of the cost imposed on regulated entities for each amendment cycle, including:

- * Compliance re-planning costs
- * Delayed or stranded capital investments
- * Administrative and reporting burdens
- * Incremental infrastructure-related costs

2. Quantify Cumulative Regulatory Burden

Publish a cumulative cost assessment reflecting the total economic impact of repeated amendments over the life of the rulemaking.

3. Align Mandates with Market Readiness

Suspend further escalation of ZEV purchase requirements until:

- * Vehicle supply is sufficient across all required classes
- * Charging and fueling infrastructure is demonstrably available and reliable
- * Fleet operators can comply without operational disruption

4. Replace Calendar-Based Mandates with Readiness-Based Triggers

Shift from fixed compliance dates to objective, measurable benchmarks tied to:

- * Infrastructure deployment levels
- * Vehicle availability and performance
- * Verified real-world operational capability

Closing Statement

The pattern of repeated amendments indicates that the market is not meeting regulatory assumptions. Continuing to enforce fixed timelines under these conditions shifts undue risk and cost onto regulated entities and undermines confidence in the regulatory framework.

Respectfully,

Jason Cole