



EPA Comments: California's Advanced Clean Fleets Waiver and Authorization

August 14, 2024

Thank you for the opportunity to comment. I am the Executive Director for the National Aquaculture Association, a nonprofit trade organization, advocating for US aquatic animal and plant farmers at the federal level, Congress and agencies, relative to policies, programs, regulations and legislation. Within the United States approximately 6,000 aquafarms are active that annually sell \$2.7 billion of live and processed farmed seafood, as well as live fish for recreational fishing and restoring at-risk fish populations, live bait, and fish and invertebrates, like marine corals, for the aquarium hobby. These farms contribute \$4 billion in economic activity to rural inland and coastal communities and 60% of the farms are small and family owned.

We request the preemption not be granted. As farmers, including California aquafarms, we use heavy duty pickup trucks and local and long-haul trucks to transport live fish, farmed seafood (live and processed), farm equipment, feed, and other inputs to customers, within the farm, to the farm, or between farms. Readily available, reliable, and cost-effective transport is critical to our farmers.

As our performance metric we compare gasoline or diesel-powered vs electric-powered heavy duty pickup trucks. Petroleum powered pickups provide greater than twice the capacity to carry products (70 cu ft vs 29 cu ft), three times the towing capacity (32,000 pounds vs 11,000 pounds) and three times or more the travel distance (350 miles vs 100 miles). There are no electric powered local delivery trucks of 26,000 gvw or long-haul trucks available that can meet the needs of the farming community. Approving the preemption will severely impact typical farm operations, increase operational costs, and close farms.

Thank you.