



*August 4, 2022 Comment letter submitted via electronic commenting system*

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**Re: Local Truckee-Tahoe Fire and EMS Comments on Draft Regulatory Language for the Advanced Clean Fleets Regulation Public Fleet Requirements**

The Northstar Fire, Truckee Fire Protection District, Olympic Valley Fire Department, and North Tahoe Fire Protection District (local Truckee-Tahoe Fire and EMS agencies) appreciate the opportunity to provide public comments to the California Air Resources Board (CARB) in response to the recent Draft Regulatory Language on Public Fleet Requirements (Draft Rule). The local Truckee-Tahoe Fire and EMS agencies provide fire response to the region along with often being the first responder for public health and safety emergencies.

Critical to the success of the local Truckee-Tahoe Fire and EMS agencies is the support that we receive from the Truckee-Tahoe Agencies. This includes support from the local utilities (Truckee Donner Public Utility District, Placer County Water Agency, Northstar Community Services District, Olympic Valley Public Services District, Tahoe City Public Utility District, and South Tahoe Public Utility District to name a few) and local governments (Town of Truckee plus Nevada and Placer Counties). There is growing concern locally, based on the current Draft Rule, that it would be increasingly hard to

achieve our critical emergency response function without the full support of the local utilities and government partners

The Truckee-Tahoe region sits in the high Sierra Nevada Mountains and is subject to harsh winter storms, atmospheric rivers, drought, and wildfires. The region is very popular as a second-home destination and with the many visitors who come every year to enjoy the regions incredible nature and vibrant communities. The region is heavily forested with steep terrain and variable conditions. The regional variability, in both climate and transient population, create challenges for fire protection and emergency response that all local agencies must work together to address.

The Local Truckee-Tahoe Fire and EMS agencies work closely with, and rely upon, other local agencies to respond to fires and emergencies. During the winter months, during blizzards and high-wind events, access to an emergency is an on-going issue with the need to clear snow along with any fallen trees blocking access. The Local Truckee-Tahoe Fire and EMS agencies rely on local utilities and governments to provide this access along with addressing any downed power lines, large water main leaks, or a sewage spill before safe access is available.

Specifically with snow removal, every local agency has very specialized multi-purpose equipment with a wide variety of attachments ranging from snow blades, snow blowers, buckets, etc. The same dump truck or front loader used to clear snow in the winter is used to address floods, fight fires, and support construction of critical infrastructure during the rest of the year. The current exemption for snow removal equipment, but only with 'permanently attached blades', does not address any of the snow removal equipment in our region and fails to understand the tools and technologies that we use to move snow.

All of the local Truckee-Tahoe agencies have very specialized equipment to be able to access locations during extreme weather events and to work in the field for as long as needed. Vehicle range is less of an issue, often needing to go only a few miles to respond to an emergency, but our trucks/equipment have significant Power Take Off (PTO) or shore power (i.e. auxiliary generator or power source) requirements. The majority of local fleets uses the engine for PTO. In many cases the hours of operation in the field are orders of magnitude more than the miles driven.

While the Local Truckee-Tahoe Fire and EMS agencies are exempt from the CARB Draft Rule, our local utility and government partners are not. Given the severity and duration of our natural events, for example our historic December 2021 storms lasted for over two weeks with extended power outages lasting over a week, it would be increasingly hard to achieve our critical emergency response function without the support of the local utilities and government partners. Achieving our mission without access to power, water, and a safe environment would not be possible.

The local Truckee-Tahoe utilities and government agencies have shared their concern that the technology, performance, and price of replacement vehicles will not be tenable during the early implementation starting in January 2024 resulting in negative impacts to

critical infrastructure and emergency response. The local Truckee-Tahoe Fire and EMS agencies encourage CARB to work closely with all utilities and governments to fully understand the critical role utilities and governments play in providing public services, maintaining critical infrastructure, and supporting emergency response.

Thank you for your consideration and support of the local Truckee-Tahoe agencies.

Regards,



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