| Department of Defense Comment Matrix Submitted: 07 November 2022 California Air Resources Board **Proposed Regulation for In-Use Off-Road Diesel-Fueled Fleets** | | | |
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| **Comment #** | **Location** | | **Department of Defense Comment** |
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| 1 | 6 | 2449(c)(18)(A) and (B) | Emergency Operation – The current definition of emergency operation under subsections (A) and (B) both start with, “Any activity *for a project*”…  Recommend deleting “for a project” from the definition in subsections (A) and (B) such that facilities operations at military installations would be included in the event of a power outage, internal power disruption, or other emergency as defined (i.e. the definition would not be limited to activities for projects but could apply to activities for facilities as well):  (A) Any activity ~~for a project~~ conducted during emergency”…;  (B) Any activity ~~for a project~~ conducted by essential service utilities”… |
| 2 | 28 | 2449(6)(E) and (F) | Relevant to the ban on adding Tier 4 interims it subsections (E) and (F), it is recommended that an exemption be added for engines that do not have a Tier 4 final model available. |
| 3 | 40 | 2449(e)(14) | Two-Engine Vehicles. The regulation, as is, prohibits two-engine vehicles from operating if either of the vehicle’s engines do not comply with the Tier phase-out schedule. The DoD operates several high-cost cranes with higher tier (i.e., Tier 3 or Tier 4) drive engines and lower tier (i.e., Tier 1 or Tier 2) auxiliary engines that installations would be required to turnover based on the auxiliary engine phase-out date. Because it is the drive engines that are responsible for the majority of emissions, recommend that two-engine vehicles be required to comply with the Tier phase-out schedule based on the primary drive engine tier or that CARB propose an alternate schedule for two-engine vehicles. |
| 4 | 44 | 2449(f)(2) | Emission Control Label. In the event that an emission control label is no longer legible, recommend extending the time period that fleets have to contact the manufacturer to 30 days. If the manufacturer is unable to affix the label, recommend extending the time period fleets have to request a replacement label to 60 days. Also, recommend that CARB work with manufacturers to set up a one-stop shop with contact information for each manufacturer to make this process easier and more streamlined for fleets. |
| 5 | 51 | 2449(g)(2)(C) | Engine Hour Meter Readings. Requires that fleets maintain date stamped photographs or a written log of the reported hour meter readings if they do not have access to a camera. Fleets are not required to report the photographs/logs but will be required to provide such documentation upon request from CARB.  Recommend the written log option be made explicitly available to those who choose not to take photos (for security purposes or other reasons) in addition to those without access to a camera. |
| 6 | 76 | 2449.1(c) | Tier Phase-Out Requirements. Meeting Tier 0 phase-out deadline of January 1, 2024 would be difficult for the Department of Defense (DoD) installations since budgets are submitted for Congressional approval three years in advance. Recommend phasing this requirement in for federal fleets in fiscal year number 3 after the rule implementation. |
| 7 | 84 | 2449.1(f) | Renewable Diesel Requirements. Recommend that federal fleets be given a transitional period from January 1, 2024, to January 1, 2025 to switch to renewable diesel based on anticipated challenges related to DoD procurement of sufficient renewable diesel supply and additional necessary supply equipment (i.e. refuelers and/or tanks)~~.~~ |