| Department of Defense Comment Matrix Submitted: 17 October 2022 California Air Resources Board **Advanced Clean Fleets Proposed Regulation** | | | | |
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| **Comment #** | **Location** | | **Department of Defense Comment** | **Specific Requested Revision** |
| **Page** | **Section** |  |  |
| 1 | A-2-9 | 2015 (b) | “Minimum Useful Life” definition, as read, can be misinterpreted to mean that the useful life is based on the model year standard the engine was certified to meet. | Recommend removing the text in the definition which states “…*from the model year that the engine and emissions control system in a vehicle was first certified for use by CARB or U.S. EPA*” and replacing with “*from the model year that is listed on the emission control label of the engine*” |
| 2 | A-2-15 | 2015(g)(1) | Requirement to Hire Compliant Fleets. The hiring entity should not be responsible for the rental agencies’ compliance verification | Recommend putting the responsibility on the rental agency to provide compliance documentation or a signed statement that its fleet is not subject to this regulation. |
| 3 | A-2-16 | 2015(i) | Large agencies will have trouble meeting a 30 day notification and reporting requirements because of larger fleet sizes. | Recommend 60 days for new fleets to put in place processes to meet the recordkeeping and reporting requirements. |
| 4 | A-2-18 | 2015.1(c)(3) | Infrastructure Construction Delay Extension. Unforeseen construction delays due to supply chain issues or other US/global issues affecting all agencies. | Recommend adding ability to renew extension for two additional one-year periods to allow for unforeseen construction delays due to supply chain issues or other US/global issues. |
| 5 | A-2-19 | 2015.1(c)(4) | Vehicle Delivery Delay Extension. Even with advanced planning, the actual ordering of vehicles may occur within 6 months of the required ICE removal date. | Recommend changing the one-year pre-order requirement to six months due to procurement cycles. |
| 6 | A-2-26 | 2015.3(d)(2) | Manufacturer Cancellation. Fleet owners are unable to meet a 90-day schedule especially if they are bound by Federal Acquisition Regulation (FAR) or requirements that or requirements that specify competitive proposals for purchasing vehicles. A competitive process could easily take 180 days if not longer to complete. | Recommend changing the 90-calendar day requirement to 180 days. |
| 7 | A-2-29 | 2015.4(b) | Reporting Deadline and End Date. Many affected fleets have other reporting requirements such as Truck and Bus and Off-road Diesel reporting requirements on January 31 and March 1, respectively. An April 1 due date allows facilities time to complete all required reporting accurately with the limited available resources. | Recommend changing the compliance report due date to April 1 of each year. |