

May 26, 2020

Chair Mary Nichols

California Air Resources Board (CARB)

Sacramento, CA 95814

RE: Advanced Clean Truck Rule (ACT)

Dear Chair Nichols and CARB Board,

The Municipal Equipment Maintenance Association (MEMA) Northern California Chapter represents 58 Government Fleet Organizations and 46 Associate Organizations in Northern California. Our membership consists of several of the 100 Best Government Fleets in North America and of the Green Fleets Award winners.

 Our members are working hard to onboard green fleet initiatives while maintaining high standards of stewardship of government resources. We have reviewed the current version of the proposed Advanced Clean Truck (ACT) regulation and believe there are several issues that should be addressed.

**COVID 19 Current Impacts:**

Due to the unanticipated staffing and financial impacts of COVID-19, we request an additional review and comment period of 90 days. Many members have been serving our communities and focusing on the public’s immediate safety, and therefore have not had time to fully take into account the changes made.

We request CARB staff update their analysis of the current and future manufacturer marketplace and the medium and heavy-duty ZEV models that will be available. Due to the varying types of medium and heavy duty specialty vehicles that special districts, municipalities, counties and Cal Trans utilize in their fleets we believe that CARB should update their analysis of the current and future ZEV vehicle makes/models that will be available for purchase within the timelines of the ACT regulation.

An update to CARB’s analysis of the current and future economic conditions that will affect availability of ZEV’s and sources of funding for government agencies should be completed. A recent survey of public fleet professionals conducted by Government Fleet Magazine showed that about 80% of fleet professionals expect a decrease in their budget in the next fiscal year. 78% of respondents expect a decrease in operational budget while 81% are expecting a decreased capital budget for vehicle replacements and fueling infrastructure. ( <https://www.government-fleet.com/357416/survey-says-80-of-fleet-managers-expect-budget-reductions-next-year> ). More than 2,100 U.S. Cities are anticipating major budget shortfalls this year and many more are planning to slash programs and cut staff in response, according to a survey of local officials released April 14, 2020, illustrating the widespread financial havoc threatened by the coronavirus pandemic (<https://www.washingtonpost.com/business/2020/04/14/cities-budget-cuts-coronavirus/> ).

Holding workshops for government agencies, (municipalities, districts, Cal Trans and counties), to better understand how COVID-19 has affected revenues and facilitate the sharing of information should be considered before setting timelines for this regulation.

**Government Fleet Considerations:**

Current definitions for emergency vehicles do not include many types of specialized vehicles and body configurations that are used by utility districts, municipalities, counties and Cal Trans. It appears that the marketplace is finding it particularly challenging to produce these vehicles, similar to police and fire needs. The requisites of 24/7 availability, fast refueling times, a robust refueling infrastructure over a large geographical area and vehicle operational duty cycles may not yet be available, reliable, or feasible.

In some cases a Plug-In Hybrid Vehicle (PHEV) makes sense with what is available for the market, although attaching a mileage range may not be the most effective way of meeting the intent of the ACT regulation. For example, many government fleet vehicles travel less than 75 miles per day and operate Power Take Off (PTO) systems such as aerial booms, hydraulic compressors, welders, generators, etc. In such cases, it would be beneficial to the environment and the fleets to have those units use battery electricity instead of vehicles that idle for multiple hours to run the PTO.

Many government fleets have already made significant investments in CARB’s past alternative fuels programs. Allowing Low Carbon Fuel Standard (LCFS) to be counted as offsetting emissions would take into account these previous investments.

We believe that costs will be higher than CARB has predicted for the needed real estate, vehicle costs and infrastructure to support the new CARB alternative fuels.

**Fleet Reporting Requirements:**

We believe that CARB has underestimated the number of personnel hours and costs that will be required to produce the information requested. While modern Fleet Management Information Systems (FMIS) hold large amounts of data regarding vehicles in the system, many systems do not have the requested information readily available. For larger fleets, consisting of thousands of vehicles, designing policies and procedures and complex reports to capture the necessary data, would be overly burdensome to fleet staff. This is especially true as many administrative staff are still working from home as a result of the COVID-19 Pandemic with no end in sight as to when things will be back to normal and all staff working on-site.

Many government fleets are dependent on publicly available refueling infrastructure. They operate a minimal number of refueling stations or none at all for a number of reasons such as; lack of capital funding to install infrastructure, lack of available real estate (or the capital funding to purchase that real estate) to install refueling infrastructure, and a lack of staffing to operate and manage refueling infrastructure. Some may not have enough vehicles in a geographic area to justify the cost of refueling infrastructure.

In conclusion we would like the CARB Board to consider these items before presenting this regulation for a vote. Allowing these government agencies/fleets time to assess and recover financially from the COVID-19 pandemic and the ensuing reduced revenues would allow a more successful implementation of the ACT regulation.

Thank you for your time and consideration.

Sincerely,

David Renschler, CPFP

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