**Caltrans Comments for the Proposed Advanced Clean Truck Rule**

**May 28, 2020**

* **Caltrans background:**
  + Caltrans’ mission is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.
  + Has a fleet of over 12,000 units is dispersed throughout California.
* **Positive Comments for the Proposed Rule:**
  + Accelerate the market for on-road zero-emission vehicles.
  + Reduce criteria and greenhouse gas emissions from heavy-duty vehicles.
  + Improved availability of heavy duty zero emission vehicles requirements. Based on our knowledge, currently, there’s no heavy-duty electric vehicle available on the marketplace to meet our needs.
  + Lower Gross Vehicle Weight Rating (GVWR) vehicles also included which may assist us in meeting our ZEV purchase requirements when replacing our light duty fleet.
  + Fuel neutrality.
* **Having a statewide fleet dispersed throughout California and needing to respond immediately to emergencies and incidents on the state highway system, Caltrans’ has many challenges with zero emission vehicles in the heavy-duty vehicle group:**
  + Heavy Duty Electric Vehicles:
    - Upfront large capital costs for heavy duty electric vehicles.
    - Heavy duty electric vehicle does not have the range and charging times that would be needed in emergency response and 24-hr operations, e.g., during storms.
  + Infrastructure:
    - Electric charging infrastructure is costly and our old facilities may not support added electrical demand or have space for it.
    - We have approximately 2420 heavy duty, on-road vehicles over 8,500 pounds GVWR.
    - The fleet is widely dispersed over 318 locations throughout California (see attached map) with about 55% of these locations having between 1 and 5 trucks; about 22% between 6 and 10 trucks; about 15% between 11 and 20 trucks; about 5% between 21 and 30 trucks; and 3% have 31 trucks or more.
    - Significant cost for fast charging for heavy duty electric vehicles.
    - Lack of hydrogen fueling infrastructure.
      * Managing a fleet within a fleet, (trucks tethered to a specialty fuel infrastructure) hampers moving vehicles around to manage the utilization of the asset
* **Recommended Considerations for the Proposed Rule:**
  + In 2025 Caltrans will be required to purchase 15% of its heavy duty vehicle replacements over 19,000 GVWR (AB739) which could be over 40 heavy duty ZEV; however, electric will not be a good solution due to slow charging times, lack of infrastructure for fast charging, and vehicle range. Hydrogen fueled vehicles have fueling times comparable to conventional fueling as well as increased range better suited for heavy duty use in the Caltrans fleet. An mechanism in the rule to incentivize hydrogen ZEV starting 2025 through 2035 in the heavier GVWR ranges could help Caltrans meet its user requirements with heavy duty ZEV, and/or an incentive program to develop heavy duty electric vehicles and EV infrastructure that meets our needs.
* **Comments on reporting**
  + Reporting type and level of availability of reporting data:
    - Home base: easily available
    - Fuel type: easily available
    - Vehicle group: not available but achievable
    - Vehicle group mileage averages available but time consuming
    - Dispatch Group: not available

If you have further questions or comment, please contact:

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