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Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Truckee Sanitary District Comments on Draft Advanced Clean Fleets (ACF) Regulation

The Truckee Sanitary District (TSD) appreciates the opportunity to provide comments on the ACF draft regulatory language (March 23 iteration) for public fleets as proposed by California Air Resources Board (CARB) staff. While the latest iteration of the ACF regulation reflects some of the exemptions and extensions that have been requested, we remain seriously concerned with the following and respectfully request further amendments accordingly:

Timelines and Public Funding. The proposed regulations continue to impose aggressive timelines for public fleets to comply and do not consider existing local agency budget constraints and funding methods for capital projects.

The proposed regulation ignores existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of essential vehicles. If required to comply with the proposed regulation as drafted, the projected infrastructure and fleet costs will likely result in the need for substantial rate increases to TSD customers. There is no current funding for these increased costs. It will take at least a year to put together a funding plan and then could take another year or more to hold a Proposition 218 protest proceedings. If voters reject such tax and fee increases, local agencies will be left with no resources to afford the immediate up-front costs necessary to comply with the regulation.

Electrifying service yards to support an electrified fleet is a much greater undertaking than a simple electricity panel upgrade or some quick trenching in the parking lot. Upgrading infrastructure, purchasing vehicles, training workforce, and complying with mandated reports is not something local agencies can easily comply with.

While savings may eventually manifest from retiring or repurposing assets oriented to internal combustion engines (ICE), they will have no effect on the upfront capital expenses. For these reasons, we believe that local governments need an extension of at least four years from regulation adoption and we encourage the State of California to develop a substantial grant program to support local governments in complying without imposing an undue burden upon their ratepayers and taxpayers already struggling to make ends meet at this time of high inflation.

Exemptions. TSD's vehicles are essential to the health and safety of its residents and thus should be fully exempt from the regulation or, at a minimum, the compliance dates should be substantially extended to allow the ZEV industry to develop viable cost-effective options. While some of TSD's vehicles are captured under the current emergency vehicle exemption, it should be expanded.

In addition to emergency vehicles currently defined in the California Vehicle Code, the following TSD vehicles must be operable 24 hours per day, 365 days per week. Any interruption in their regular use could jeopardize the health and safety of the community we serve.

- Sewer Hydro-Excavation Vehicles
- Sewer CCTV Condition Assessment Vehicles
- Sewer Hydro Jetting Vehicles
- Sewer Bypass Pumping Vehicles & Equipment

Effective electrical ZEV operation will depend upon a consistently accessible source of electricity, the risk of disruption whether due to an earthquake, public safety power shutoff, rolling brownout, wildfire, flood, or other natural disaster is too great to risk the operability of these vehicles and health and safety of TSD's customers.

Price Caps. We request that CARB impose price caps to ensure the market positively responds with vehicles at competitive rates. Local governments strive to be good stewards of the taxpayer's dollars, but without price caps, complying with the proposed regulations may force a purchase of ZEVs that are put to market at an artificially inflated rate. With the inclusion of a percentage price cap, manufacturers will be unable to potentially manipulate the market with unwarranted unit costs.

Inventories. We request CARB provide a list of available manufacturers that have market-ready vehicles in the medium- to heavy- duty class sizes, 2B- 8. Availability of model/body types of multiple weight classes (and functions) are not confirmed by fleets, but rather by manufacturers informing CARB that models will be available.

Again, thank you for allowing us the opportunity to provide written responses to the proposed ACF Regulations.

Sincerely,



Blake R. Tresan, PE
General Manager/Chief Engineer
Truckee Sanitary District

cc: California Special Districts Association (via email: advocacy@csda.net)