April 7, 2023

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

RE: Town of Truckee Comments on Draft Advanced Clean Fleets (ACF) Regulation

The Town of Truckee 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 we appreciate that the latest iteration of the ACF addresses some of the concerns we previously expressed, in particular regarding the rules for snow removal equipment, we remain deeply concerned about the current draft regulation's potential negative impacts on critical infrastructure and our ability to support public safety and emergency response for our community. Our concerns are detailed in the attached joint letter sent August 17, 2022. However, below is a summary of some of the Town's more substantial concerns:

- The Town operates in the high Sierra Nevada Mountains at elevations between 6,000-8,000 feet with winter blizzards, atmospheric rivers/floods, severe thunderstorms, and wildfires. Maintaining roads, drainage, and other critical infrastructure necessary for public safety and emergency response requires specialized fleets with off-road, 4x4, and custom bodies. Transit services also require four or all-wheel drive vehicles. Almost all field vehicles require robust Power Take Off (PTO) capabilities to run cranes, buckets, motors, compressors, pumps, vacuums, and a variety of equipment. Commercially viable ZEV's that meet our needs do not exist, contrary to the fact that some manufacturers have indicated plans to provide them in the future. We ask that commercial availability be defined through an objective, neutral process and not left this up to the manufacturers.

- 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. In addition, while the regulations provide for some exemptions, the process for exemption unnecessarily adds significant administrative requirements.

  The proposed regulation also 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 add substantial costs to the Town operations. There is no current funding for these increased costs.

- Cost and 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. Charging infrastructure is needed and additional storage capacity must be attained as in many cases the electrification of the fleets will require two EV vehicles be purchased to replace on hybrid or gas/diesel-powered vehicle because of the limitations on battery life and range. Upgrading infrastructure, purchasing vehicles, training workforce, and complying with mandated reports is not something the Town can easily comply with.

Please contact myself or the Town of Truckee Public Works Director, Dan Wilkins (dwilkins@townoftruckee.com, 530-582-2902) if we can be of further assistance. Again, thank you for allowing us the opportunity to provide written responses to the proposed ACF Regulations.

Sincerely,

Jennifer Callaway

Jen Callaway
Town Manager
Town of Truckee

Attachment: August 17, 2022 Joint Comment Letter (excluding Attachments 2 and 3)

August 17, 2022 Comment letter submitted via electronic commenting system

Mr. Tony Brasil
Mobile Source Control Division
California Air Resources Board
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Sacramento, CA 95814

Mr. Craig Duehring
Mobile Source Control Division

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Mr. Paul Arneja
Mobile Source Control Division
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Re: Local Truckee-Tahoe Public Agencies Comments on Draft Regulatory Language for the Advanced Clean Fleets Regulation Public Fleet Requirements

The Truckee Donner Public Utility District, Northstar Community Services District, Tahoe City Public Utility District, North Tahoe Public Utility District, Alpine Springs County Water District, Olympic Valley Public Services District, Truckee Sanitary District, South Tahoe Public Utility District, Sierra Lakes County Water District, Town of Truckee, and Placer County Water Agency (Truckee-Tahoe Public Agencies) appreciate the opportunity to provide public comments to the California Air Resources Board (CARB) in response to the recent Draft Regulatory Language on Public Fleet Requirements (Draft Rule). The Truckee-Tahoe Public Agencies provide critical water, waste-water, electric, and public services while supporting community safety and emergency response. We are deeply concerned about the current Draft Rule's potential negative impacts on critical infrastructure and our ability to support public safety and emergency response in the Truckee-Tahoe region.

The Truckee-Tahoe Agencies Operate in a Unique Mountain Environment:

The Truckee-Tahoe region lies high in the Sierra Nevada Mountains on the eastern slope and the utilities and local governments operate at elevations between 6,000-9,000 feet with winter blizzards, atmospheric rivers/floods, severe thunderstorms, and wildfires. Maintaining critical infrastructure and supporting public safety and emergency response requires specialized 'vocational' fleets with off-road, 4x4, and custom chassis. All vehicles require robust Power Take Off (PTO) capabilities to run cranes, buckets, motors, compressors, pumps, vacuums, and a variety of equipment needed in the field to operate water, waste-water, and electric utilities plus provide public services.

It is important to note that almost all of the Truckee-Tahoe Agencies are small to medium sized public agencies with 10's to 100+ employees and relatively small fleets (10-100+). Every vehicle in our fleet (MD/HD) serves multi-purposes. A truck with removable snow removal attachments (blowers and blades) is used for construction projects in the summer. In responding to a power outage or water/sewer emergencies, our fleet rarely travel more than 10 miles but may remain in the field for many days until the job is done.

Electric Utility Repair During Historic December, 2021 Storms

Role of Truckee-Tahoe Local Public Agencies

For the last two years we have been working directly with CARB staff and Board to raise awareness of the key roles played by the water, waste-water, and electric utilities along with all local governments in maintaining critical infrastructure and supporting public safety and emergency response. A majority of our fleets must be available 24/7/365 and, in extended emergencies, all of our fleets play a role.

Truckee Donner Public Utility District, South Tahoe Public Utility District, and Placer County Water Agency have participated in CARB workshops and provided written and verbal comments with the goal of informing the regulation. We have directly raised concerns about:

- The unique needs of our fleets;
- The extensive role of PTO;
- The ability to work and refuel in the field for many days;
- Our critical role in public safety and emergency response;
- The unavailability of commercially viable ZEV's; and
- The severe negative impacts to rates and community costs.

To better understand the key role that the Truckee-Tahoe Agencies play in supporting public safety and emergency response, please see the attached support letter from a coalition of local Fire Departments (Attachment 1). One compelling recent example is the critical role that South Lake Tahoe Public Utility District played in maintaining fire flows during the 2021 Caldor Fire which threatened South Lake Tahoe and surrounding areas.

All Truckee-Tahoe Agencies have worked with their respective joint action groups (Association of California Water Agencies - ACWA, California Municipal Utilities Association - CMUA, Northern California Power Agency - NCPA, and California Association of Sewer Agencies – CASA) to ensure that we understand the Draft Rule, can help improve the regulation, and raise our concerns. We strongly encourage CARB staff and Board to engage with ACWA, CMUA, NCPA, and CASA. We strongly support the numerous verbal and written comments already provided.

Most important, as public utilities and local government, the Truckee-Tahoe Agencies are bound to responsibly serve the public and to operate in an open and transparent manner. We are not like the vast majority of the fleets covered under the public fleets Draft Rule and must be prepared to keep the public safe and the lights on and the water/waste-water flowing during historic snowstorms. We must also comply with public meeting laws/regulations, follow public procurement rules and bid processes, and ensure that our communities are protected.

Key Opportunities to Improve the Draft Rule:

- **The specific role and needs of water, waste-water, electric, and local governments must be considered in the next Draft Rule.** This is especially true of the challenging environment in which the Truckee-Tahoe Agencies operate. It is important to note that Public Fleets overall (i.e. MD/HD fleets) represent a very small percentage of the overall transportation GHG emissions that CARB is targeting and water, waste-water, and electric utilities along with local governments represent a small fraction of overall MD/HD fleets. While public utilities and local governments have provided details and specific feedback on the previous Draft Rules, these deficiencies have yet to be addressed.

  The Truckee-Tahoe Agencies, along with all public utilities and local governments, recognize that addressing our unique needs may not be possible in the context of the overall Public Fleets objectives. We welcome any suggestions from CARB staff and Board on how to address this incompatibility.

- **January 1, 2024 date with CARB adoption anticipated in spring, 2023 is neither technically nor economically viable.** All public utilities and governments are required to conduct open and transparent processes when setting rates, adopting budgets, and procuring equipment. The public bid process for the Truckee-Tahoe Agencies specialty fleets are already very complex and can take many months or longer to complete. Given limited commercial availability of ZEV technology today and in the near future, public utilities and local governments can't adequately plan and budget for the significant reductions in performance and increases in costs that we are facing under the current Draft Rule.

All public agencies/governments must adhere to strict and complex budgeting processes with extensive public processes that take significant time to develop, even when costs and lead-times are known. This is also true of public bidding process with strict public notice and evaluation before being presented to public Boards or Councils for approval. Adoption in spring, 2023 with no published specification and costs for our fleets will not allow for an effective rollout in 2024.

Furthermore, the lack of supply compounded by the extreme demand caused by anticipation of the current January 1, 2024 date has already escalated costs with fleet delivery being routinely quotes in number of years. This has been compounded by COVID and other supply chain issues which do not appear to be diminishing. While the Draft Rule has a one-time, one year extension, this will be woefully inadequate. A 2027 or later date would appear to be more realistic and would allow for a more effective implementation of the regulation.

- **Low-Emission Counties Should Not be 'Solely'.** All of the Truckee-Tahoe Agencies have all or significant portions of their service territories in low-emission areas on the east-slope of the Sierra Nevada. However, many of the public agencies are in counties (such as Placer and El Dorado) which are not classified as low-emission due to the populated/urban areas on the western portion of counties.

  In Truckee Donner Public Utility's case, well over 95% of our service territory and operations are in Nevada County – which is a low-emission county – but we do have a small portion in Placer County which is not low-emissions. To be clear, this is two small neighborhoods one of which is the south shore of Donner Lake (which looks exactly like the north shore of Donner Lake in Nevada County). The qualifier of 'Solely' should be removed and replaced with a more accurate characterization of low-emission areas. All of the Truckee-Tahoe Agencies should qualify as operating in a low-emission area with compliance delayed until 2027.

- **The Exemption for Snow Removal Equipment Needs to be Modified to Address Actual Equipment Used.** We appreciate that CARB has identified snow removal as a critical function to keep our communities accessible and safe. During the recent historic December, 2021 storms, all of the Truckee-Tahoe Agencies spent extended time moving snow to access key facilities, repair damage, and support emergency response. This was critical to maintaining critical services and responding to emergencies but also supported overall public safety as our equipment supported Town, County, and State snow removal efforts.

  However, the current Draft Rule still requires 'dedicated' snow removal equipment to qualify for the exemption. This makes no sense for the Truckee-Tahoe Agencies as not a not a single public fleet vehicle in our region that is regulated by the ACF has a permanently attached blade (we tend to use blowers more than blades) and all of our fleets serve multi-purposes (doing snow removal in the winter and construction projects for the rest of the year, for example). This is especially true

for small/medium sized utility/agency fleets (<100 vehicles) but applies to any size organization since no place in California does significant snow removal for more than 4-5 months per year. We again respectfully request that the Draft Rule incorporate an accurate understanding of snow removal fleets and reflect the reality that almost every vehicle in a fleet serves multi-purposes.

- **The Process of Using an Unavailability List Should be Changed to an Availability List Given the Lack of Commercial Availability Today and into the Near Future.** The Truckee-Tahoe Agencies appreciate CARB's acknowledgement that ZEV availability will be an ongoing challenge; especially for the heavy duty, off-road, and heavy PTO applications required by public utilities and governments in our region. However, the preliminary lists shared by CARB staff during the July 26, 2022 already had some vehicle classes listed as available which the water, waste-water, and electric utilities plus local governments know do not exist commercially when factoring in performance, costs, availability, and lead time.

  Many members from the public utility and local government community attended the recent Expo in Southern California. While there were some prototypes and early production displays, none of the manufacturers had plans within the next 3-5 year to begin production of the vehicles the Truckee-Tahoe Agencies need. For example, all of our fleets have a significant amount of service trucks (F150, 250, 350, 450, and 550 or equivalent) with custom bodies and extensive PTO. As presented by CARB staff at the July 26, 2022 workshop these trucks are listed as available now. However, the only vehicle being delivered in limited quantity today is the F150 Lightening and, based on recent orders and lead-times from sister agencies, it appears that production is already tied up for many years. The unavailability gets worse as the vehicle size increases.

  To exemplify the challenges to converting the specialized Internal Combustion Engine (ICE) Truckee-Tahoe Agencies fleet to ZEV, we have done some preliminary calculations to convert the performance specifications of a few key vehicle types into an equivalent Electric Vehicle (EV) specification. EV's appear to be the closest to commercialization for the ZEV's that we need. Given the fact that limited manufacturer specifications exist for EV versions of our fleet, we used the Heat Rate and EV conversion data provided by CARB to compete our analysis.

  To model the extensive time spent in the field along with PTO requirements, the analysis converts a single tank of fuel for our ICE examples into an equivalent EV. While this analysis does not fully capture the practice of refueling in the field during extended outages and emergencies, it provides a baseline to make realistic assessments of the availability of ZEV's starting in 2024, 2027, and beyond.

  For most local fleet vehicles, total range is not a significant concern when it comes to ZEV vehicles. Rather, our main concern is "hours of operation" for the PTO which empowers booms, cranes, augers, vacuum pumps, etc. once on-site. Our vehicles are also required to carry tools and equipment into the field. This includes

heavy hydraulic equipment built into the chassis. Thus, payload capacity is a critical performance specification for public utility and local government fleet vehicles. Any fleet vehicle we purchase, whether ICEV, NZEV, or ZEV, must meet the current fleet vehicle performance in the areas of energy storage and payload capacity in order to be a true “one-to-one” replacement.

Given the above, we started with current payload and energy storage capabilities of our ICEV fleet vehicles and leveraged assumptions provided by CARB in the Standardized Regulatory Impact Assessment (dated May 18, 2022) to estimate a ZEV equivalent. For the sake of brevity we include a summary of our results below and have opted to include a detailed derivation of our methodology, including actual bid specifications for each example vehicle, as a separate attachment to this letter (Attachments 2 and 3). Pictures of each of the example vehicles are provided on the following page.

Current ICE Fleet vs. EV Equivalent Comparison:

Vehicle Description		Electric Utility Line Truck	Vactor vacuum pump truck	Service Body	Service Body
Vehicle Class		8	8	5	4
Make/Model		International 7500 SFA 4x4	Freightliner 114SD 6x4	Ford F550 4x4	Chevy 3500 4x4
GVWR	[Lbs]	39,000	66,000	19,500	14,000
Current Specifications (ICEV)					
Weight	[Lbs]	31,920	40,780	14,330	11,600
Payload	[Lbs]	2,500	17,283	2,000	1,200
Energy Storage	[kWh]	1,883 (471 useful)	2,636 (659 Useful)	1,506 (377 useful)	1,130 (282 Useful)
ZEV (Battery Electric) Specifications					
Weight	[Lbs]	41,065	67,743	22,064	12,800
Payload	[Lbs]	-2,065	-1,743	-2,564	-3,093
Energy Storage	[kWh]	607	849	486	363
Battery Weight	[Lbs]	8,431	11,792	6,750	5,042
Battery Cost	[$]	$121,400	$169,800	$97,200	$72,600

One concern we identified in this analysis was that the cost of the battery unit was exceedingly expensive. We understand that this cost is implicit to the purchase price of the ZEV and CARB expects this to be offset by reduced maintenance and fuel costs. However; Li-Ion battery packs have a limited lifetime measured in number of charge cycles. We expect that end-of-life battery replacement will not be uncommon in a ZEV fleet for small agencies such as ours since each of our vehicles see heavy utilization (e.g. more charge cycles per day). The chassis and drive trains are expected to outlast the battery lifetime requiring replacement. This significant cost was not accounted for in the Regulatory Impact Assessment.

Figure 1 Class 8 Electric Utility Bucket Truck

Figure 2 Class 5 Water Utility Crane Service Body

Figure 3 Class 4 Service Body

Figure 4 Class 8 Vacuum Truck

It is also important to note that in all cases the additional weight from the battery exceeded the GVWR rating for the axels if we maintain existing payload specifications. To accommodate the additional battery weight we must either:

1) Retain energy capacity (e.g. length of operating time) and eliminate payload of existing tools & equipment requiring an additional vehicle; or
2) Retain payload of existing tools & equipment and significantly reduce energy storage – resulting in a 25% to 65% reduction of operating time.

This demonstrates that, for the Truckee-Tahoe Agencies, current and near future ZEVs are not available as a "one-to-one" replacement of the existing ICE vehicle for such configurations. Rather, the ZEV must compromise payload and/or time in the field to accommodate the additional size and weight of a battery pack. It is important to note that this analysis does not consider the additional logistics (and equipment purchases) associated with in-field refueling of the ZEV. Nor does it account for cold weather degradation of battery performance. Thus the deficiencies identified by this analysis are likely understated.

Any ZEV unavailability must consider, in addition to the performance specifications and ability to provide a one-to-one vehicle replacement, the manufacturing capacity against demand, the lead-time, and costs. Is a vehicle available if the lead time is measured in years and the cost is two to three times more than the current ICE version? With regards to manufacturing capacity and multi-year lead-times, CARB staff has stated that this is not a concern for compliance since it is based on vehicle purchase and not delivery. This statement ignores the fact that the Local Truckee Agencies – and all public utilities and local governments – will not be able to maintain critical infrastructure and support public safety/emergency response while we wait years for our ZEVs to arrive.

The Truckee-Tahoe Utilities, given the fact that most of our fleets will not be commercially available as a ZEV before 2027 and well beyond, ask that CARB consider switching from an Unavailability List to an Availability List based on the above criteria. This would avoid the 100's or 1000's of unavailability requests that CARB staff is surly to receive and allow CARB to identify and optimize the benefits of what ZEV's are available.

- **The Final Regulation Must Consider Grid Reliability and Availability with 1+ Week Outages Factored In.** The Truckee-Tahoe Agencies cannot emphasize enough our essential role in maintaining critical infrastructure and supporting public safety/emergency response. No community can function for long without water, waste-water, electricity, and local government services. Operating above 6,000 feet elevation, we are not like the vast majority of the other fleets covered in the Draft Rule.

  A reliable grid with adequate electric generation resources is necessary for the success of an EV fleet. Unfortunately, it has been widely documented by the California Independent System Operator (CALISO) that California does not have

adequate electric resources now (1000's of MW's short this summer). This problem will only get worse through the end of the decade based on CAISO statements and projections. Given this reality, how can public utilities and local governments dependably charge EVs to serve communities who rely on us every day?

Electric resource adequacy going forward is only one concern about grid reliability and availability. Extreme weather events are creating natural disasters which are challenging our ability to effectively respond to outages/emergencies and maintain critical community services. During the historic December, 2021 winter storms, the region experienced wide-spread power outages that lasted days and weeks. Truckee Donner Public Utility District responded to numerous outages over a two week period with the average outage lasting almost one-day. We had a few thousand customers out for 2-3 days and some smaller areas out over one week. It should be noted that on the Western slope of the Sierra Nevada, PG&E had over 10,000 customers out at one week and thousands still out at three weeks.

While grid reliability due to unplanned outages and grid availability due to insufficient electric resources are key issues, the recent addition of wildfire safety power outages (i.e. Public Safety Power Shut-Off or PSPS) may be even more problematic. The Truckee-Tahoe Agencies are all transmission dependent on NV Energy or PG&E. In Truckee-Tahoe, NV Energy has a wildfire safety power outage program similar to PSPS called Public Safety Outage Management or PSOM. Like PSPS, and due to length of an extreme weather event plus the fact that electric utilities must visually inspect 100% of their overhead electric distribution system after a PSPS/PSOM, communities must be prepared for wildfire safety power outages that will last a minimum of one day and often multi-days. Given the chance of back-to-back weather systems, PSPS/PSOM events could easily go for one week or longer.

The Truckee-Tahoe Agencies would like CARB to consider electric resource adequacy, grid reliability, and wildfire safety power outages when determining the availability of an EV or ZEV. A large majority of our fleets, in order to maintain critical infrastructure and support public safety/emergency response, must be able to fully function without the grid for at least one week.

CARB staff, in response to the repeated comments made regarding grid reliability/availability, have recently addressed the concern stating that EV charging powered by fossil fuel generators, either stationary or in the field, is the solution. This seems to be neither technically viable nor would it allow for the fleets to continue to function while being charged in the field. We request that CARB identify how this solution will meet the needs of public utilities and local governments.

Invitation of Collaborate to Meet Goals of ACF:

The Truckee-Tahoe Agencies appreciate the challenges that CARB faces in implementing the ACF; especially for the water, waste-water, and electric utilities plus local governments that fall on the Public Fleets Draft Rule. We continue to support the

goals of this effort and have provided extensive comments over the last two years. However, the current Draft Rule has done little to address very serious concerns and deficiencies which are incompatible with our public service obligations. We welcome the opportunity to continue to dialog with CARB staff and to lend our expertise in crafting a final rule that will both meet CARB's obligations while protecting our ability to maintain critical infrastructure and support public safety/emergency response. We would be happy to host CARB staff/Board in Truckee-Tahoe, come to Sacramento to meet, or set up a Zoom at your convenience.

Please contact Truckee Donner Public Utility District's Public Information and Strategic Affairs Director Steven Poncelet (stevenponcelet@tdpud.org, 530-582-3951) if we can be of further assistance or to schedule a meeting. Thank you for your consideration and support of the Truckee-Tahoe Agencies and the communities that we serve.

Regards,

Brian C. Wright
General Manager
Truckee Donner Public Utility District

Mike Staudenmayer
General Manager
Northstar Community Services District

Sean Barclay
General Manager
Tahoe City Public Utility District

Bradley Johnson
General Manager
North Tahoe Public Utility District

Mike Geary
General Manager
Olympic Valley Public Services District

Andy Fecko
General Manager
Placer County Water Agency

John Theil
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South Lake Tahoe Public Utility District

Blake Tresan
General Manager
Truckee Sanitary District

Joe Mueller
General Manager
Alpine Springs County Water District

Paul A. Schultz
Paul A. Shultz
General Manager
Sierra Lakes County Water District

Jen Callaway
Town Manager
Town of Truckee

Attachments:

1. Local Truckee-Tahoe Fire Departments Support Letter
2. ICE to EV Fleet Conversion Methodology and Calculations
3. Truckee-Tahoe Agency Recent Fleet\ Bid Specifications Used in Calculations

CC: CARB Board Chair Liane M. Randolf
CARB Board Vice Chair Sandra Berg
CARB Board Member Daniel Sperling, Ph.D
CARB Board Member Gideon Kracov
CARB Executive Officer Dr. Steven Cliff
Nick Blair, Association of California Water Agencies (ACWA)
Frank Harris, California Municipal Utilities Association (CMUA)
Emily Lemei, Northern California Power Agency (NCPA)
Sarah Deslauriers, California Association of Sanitation Agencies (CASA)

August 4, 2022 Comment letter submitted via electronic commenting system

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Re: Local Truckee-Tahoe Fire and EMS Comments on Draft Regulatory Language for the Advanced Clean Fleets Regulation Public Fleet Requirements

The Northstar Fire, Truckee Fire Protection District, Olympic Valley Fire Department, and North Tahoe Fire Protection District (local Truckee-Tahoe Fire and EMS agencies) appreciate the opportunity to provide public comments to the California Air Resources Board (CARB) in response to the recent Draft Regulatory Language on Public Fleet Requirements (Draft Rule). The local Truckee-Tahoe Fire and EMS agencies provide fire response to the region along with often being the first responder for public health and safety emergencies.

Critical to the success of the local Truckee-Tahoe Fire and EMS agencies is the support that we receive the Truckee-Tahoe Agencies. This includes support from the local utilities (Truckee Donner Public Utility District, Placer County Water Agency, Northstar Community Services District, Olympic Valley Public Services District, Tahoe City Public Utility District, and South Tahoe Public Utility District to name a few) and local governments (Town of Truckee plus Nevada and Placer Counties). There is growing concern locally, based on the current Draft Rule, that it would be increasingly hard to

achieve our critical emergency response function without the full support of the local utilities and government partners

The Truckee-Tahoe region sits in the high Sierra Nevada Mountains and is subject to harsh winter storms, atmospheric rivers, drought, and wildfires. The region is very popular as a second-home destination and with the many visitors who come every year to enjoy the regions incredible nature and vibrant communities. The region is heavily forested with steep terrain and variable conditions. The regional variability, in both climate and transient population, create challenges for fire protection and emergency response that all local agencies must work together to address.

The Local Truckee-Tahoe Fire and EMS agencies work closely with, and rely upon, other local agencies to respond to fires and emergencies. During the winter months, during blizzards and high-wind events, access to an emergency is an on-going issue with the need to clear snow along with any fallen trees blocking access. The Local Truckee-Tahoe Fire and EMS agencies rely on local utilities and governments to provide this access along with addressing any downed power lines, large water main leaks, or a sewage spill before safe access is available.

Specifically with snow removal, every local agency has very specialized multi-purpose equipment with a wide variety of attachments ranging from snow blades, snow blowers, buckets, etc. The same dump truck or front loader used to clear snow in the winter is used to address floods, fight fires, and support construction of critical infrastructure during the rest of the year. The current exemption for snow removal equipment, but only with ‘permanently attached blades’, does not address any of the snow removal equipment in our region and fails to understand the tools and technologies that we use to move snow.

All of the local Truckee-Tahoe agencies have very specialized equipment to be able to access locations during extreme weather events and to work in the field for as long as needed. Vehicle range is less of an issue, often needing to go only a few miles to respond to an emergency, but our trucks/equipment have significant Power Take Off (PTO) or shore power (i.e. auxiliary generator or power source) requirements. The majority of local fleets uses the engine for PTO. In many cases the hours of operation in the field are orders of magnitude more than the miles driven.

While the Local Truckee-Tahoe Fire and EMS agencies are exempt from the CARB Draft Rule, our local utility and government partners are not. Given the severity and duration of our natural events, for example our historic December 2021 storms lasted for over two weeks with extended power outages lasting over a week, it would be increasingly hard to achieve our critical emergency response function without the support of the local utilities and government partners. Achieving our mission without access to power, water, and a safe environment would not be possible.

The local Truckee-Tahoe utilities and government agencies have shared their concern that the technology, performance, and price of replacement vehicles will not be tenable during the early implementation starting in January 2024 resulting in negative impacts to

critical infrastructure and emergency response. The local Truckee-Tahoe Fire and EMS agencies encourage CARB to work closely with all utilities and governments to fully understand the critical role utilities and governments play in providing public services, maintaining critical infrastructure, and supporting emergency response.

Thank you for your consideration and support of the local Truckee-Tahoe agencies.

Regards,

Jason Gibeaut, Division Chief
Northstar Fire Department
JGibeaut@northstarcsd.org

Kevin McKechnie Digitally signed by Kevin McKechnie
Reason: I attest to the accuracy and integrity of this document
Date: 2022.08.03 10:41:35-07'00'

Kevin McKechnie, Fire Chief
Truckee Fire Protection District
kevinmckechnie@truckeefire.org

Steve Leighton Digitally signed by Steve Leighton
DN: cn=Steve Leighton, o=NTFPD, ou, email=leighton@ntfire.net, c=US
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Steven Leighton, Fire Chief
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Allen Riley Digitally signed by Allen Riley
Reason: I attest to the accuracy and integrity of this document
Date: 2022.08.03 10:48:17-07'00'

Allen Riley, Fire Chief
Olympic Valley Fire Department
ariley@olympicvalleyfire.org

CC: Steven Poncelet, Truckee Donner Public Utility District
Truckee-Tahoe Agencies