



CITY OF REDDING

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Craig Segall
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: City of Redding Comments on 15-Day Proposed Advanced Clean Fleets Language

The City of Redding (City) appreciates the opportunity to provide comments on the March 23, 2023, 15-day regulatory package ("15-day Changes") of the California Air Resource Board's (CARB) Advanced Clean Fleets (ACF) rule for public fleets ("proposed rule"). While the City supports CARB's efforts to achieve zero-emissions, the proposed rule will restrict our City-owned utilities from maintaining safe and reliable service to our citizens. Our utilities rely on highly specialized medium- and heavy-duty vehicles to respond to emergencies, restore service, and prevent disruptions to vital services within our City, as well as within areas that we serve as a mutual aid provider.

Established in 1887, Redding is a low-income community that is home to approximately 93,611 residents. As a full-service City, Redding provides extensive services including, but not limited to, power, water, wastewater, solid waste, storm drains, airports, streets, and public transportation. Our City-owned utilities serve approximately 44,000 customers. In total, the City owns and operates 229 Medium- and heavy- vehicles (MDV/HDV) subject to the ACF. Restricting vehicle retirement to the 13th model year will impact our ability to respond to emergencies, provide mutual aid to other municipal utilities, and modernize our fleets.

The City supports Joint Comments submitted by the Southern California Public Power Authority, Northern California Power Agency, and California Municipal Utilities Association (Collectively, the "Joint Public Agencies"), and urges CARB to ensure that the adopted regulation works for municipal utilities and the public that we serve.

The City has faced several major emergencies over the last five years, including wildfire and extreme snowfall events. As proposed, the regulation will jeopardize the availability of vehicles being available for future events. For example, during the 2018 Carr Fire emergency, all 43 MDV/HDV from the Electric Department's fleet was dispatched for emergency response. This number far exceeded the 25% emergency exemption for the Electric Department's fleet but not exceeding 25% of the entire City's fleet, causing a disparity. The proposed rule dictates that

vehicles must be replaced by a ZEV even if there is no ZEV commercially available or capable of meeting the utility's needs because the utility cannot apply for an exemption. When a vehicle reaches the end of its useful life, it is critical that we are able to replace the vehicle in order to safely maintain reliable services and emergency response capabilities.

Another problematic example involves the City providing mutual aid. In January of 2023, Redding received a request for mutual assistance from another municipal utility asking for four distribution crews. Each crew consists of one bucket truck, line truck, and foreman truck, all considered MDV/HDV. Twelve vehicles were dispatched 120 miles from Redding, exceeding 25% of the Electric Department's fleet of 43 vehicles. If the remaining 75% were ZEVs, that would leave Redding without the capacity to respond to emergencies within its territory. Redding would have to decline the request for mutual assistance to ensure it had the resources at home to provide emergency response.

Lastly, waiting until the vehicle is 13 years of age would impact our ability to modernize our fleets since we typically turn our vehicles over after ten years or when a certain mileage is reached. The procurement process begins well before the vehicle's retirement date; however, the new provision would prevent fleet managers from being able to request the exemption until after that 13th year is reached, potentially making the vehicle 15 years old before the replacement arrives. This creates an additional issue because certain vehicles would then be in violation of California's Truck and Bus Regulation, which requires any vehicle with a GVWR over 14,000 to be taken out of service after 13 years. Effectively, it would create a period of time where the utility would be unable to operate the vehicle in question while waiting for a decision on the exemption request.

We ask that CARB to remove the recently added restriction on vehicle retirement age arbitrarily set at the 13th model year, address the regulation's shortcomings noted by the Joint Public Agencies, and open an ACF implementation rulemaking immediately following adoption of the proposed rule to ensure a forum for reviewing the ongoing implementation of the regulation.

Respectfully submitted,

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