



City of Corona
Department of Public Works
"Protecting Public Health"

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October 26, 2021

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Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Subject: ADVANCED CLEAN FLEETS REGULATION COMMENT LETTER ON
PUBLIC AGENCY REQUIREMENTS

Dear Rulemaking Staff:

The City of Corona (City) appreciates the opportunity to comment on the California Air Resources Board's (CARB's) Proposed Advanced Clean Fleets (ACF) Regulation. The City commends CARB's efforts to reduce Green House Gas (GHG) emissions in California, a feat not easily accomplished. The City of Corona is located within Riverside County adjacent to the City of Riverside, a severe ozone area¹. As such, we recognize the need to reduce GHG emissions and support California's transition away from fossil fuels to zero emission technologies.

The City of Corona is a provider of essential public services whose mission is to protect public health by providing the highest quality water, reclaimed water, electric service, and efficient water reclamation. We take great pride in being able to serve the community and always strive to provide our customers with the best possible service while remaining fiscally responsible.

The City's fleet is regulated under South Coast Air Quality Management District (SCAQMD) rules 1191 and 1196. SCAQMD rules 1196 and 1191 both restrict the purchase of diesel-fueled vehicles and push for the purchase of low emission vehicles (LEV) such as CNG and/or zero emission vehicles (ZEV) when available. These vehicles are listed on CARB's website and only CARB approved vehicles can be purchased unless certain fleet requirements are met. The proposed ACF regulation does not allow alternative fueled vehicle purchases, even though many South Coast agencies have already invested in alternative fueling infrastructure and vehicles. In lieu of diesel, the City has invested heavily in CNG technology, including heavy duty vehicles and a CNG fuel station for the City and the public. A reduction in emissions is already being achieved in South Coast using alternative fuel technology. Allowing alternative fuel vehicles to be

¹ According to the "California Ozone and PM2.5 Non-Attainment Areas" map on slide 5 from the presentation given by CARB on 9/9/2021.

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purchased in addition to electric, will allow agencies in South Coast to utilize infrastructure already in place, purchase vehicles that are currently available with proven technology, and provide near-term GHG reductions while ZEVs become more widely available.

To provide water, water reclamation, and electric service to its customers, the City maintains a heavy-duty on-road fleet of 39 vehicles, most of which are specialty vehicles. In order to avoid operational impacts, it is critical that the performance capabilities of new ZEVs are fully vetted before requiring them to be purchased. In addition, the draft ACF regulation should provide sufficient flexibility for purchasing options when there is a lack of commercially available ZEVs that meet the required performance criteria. The current draft exemption for emergency response vehicles recognizes the need for specialty vehicle exemptions, but the way it is currently written, is unattainable. The exemption language should be revised to exempt the requirement for purchasing a ZEV when one is not available to be purchased and delivered within a reasonable period of time.

The City recommends having an independent advisory panel to evaluate zero-emission vehicle availability which would ease not only the burden on fleets to research the markets but would ease the amount of documentation CARB receives from fleets who need to provide evidence of vehicle unavailability. A report of the market and availability of vehicles posted on the CARB website would enable fleets to select available vehicles for purchase similar to current SCAQMD rules 1191 and 1196. If vehicle manufacturers are backlogged and unable to accept additional orders, this information would also be useful in planning for vehicle replacement. The advisory panel would serve as a crucial resource to increase efficiency for both CARB staff and fleets subject to this regulation by analyzing the markets and providing real-time market data. In the absence of an independent advisory panel, agencies would be challenged to find an available and comparable replacement vehicle that can be delivered in a timely manner while still maintaining a high level of customer service.

Current infrastructure for diesel fuel is abundant with about half of available gas stations providing a diesel fuel option. As electric vehicles become the focus for manufacturers, the infrastructure needs to be put in place to recharge those vehicles prior to purchase requirements. Public agencies plan their budgets well in advance of the beginning of each fiscal year the budget will reflect, and prior to implementation, the City's council needs to approve the budget and any proposed capital projects. With each electric charging station costing thousands of dollars, funding for a project to install even a single charging station becomes a huge challenge when various capital projects are being proposed with competing needs. Costs extend beyond vehicle purchase price and include staff training, infrastructure installation, maintenance, and electricity costs. The purchase requirement set to begin in 2024 does not provide public agencies enough time to effectively budget for the stark increase in costs necessary to comply with CARB's proposed regulation. Additional funding opportunities are needed by CARB to ease the burden of installing new infrastructure to allow fleets to utilize ZEVs with minimal disruption of normal City functions and aid in the success of this regulation. The City also recommends extending out the compliance deadlines to provide fleet owners an opportunity to install needed infrastructure and begin budgeting for ZEV replacement

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costs. The delayed start date would also provide manufacturer's more time to develop ZE specialty vehicles utilized by public agencies.

In summary, more flexibility needs to be added to the draft ACF regulation to allow public agencies to continue to serve their community and maintain compliance. Exemptions are needed for emergency response and in cases where ZEVs are not available. In addition, funding opportunities for public agencies are critical to not only allow for the purchase of ZEVs but to install the infrastructure that goes along with these vehicles. Incorporating alternative fuels into the regulation provides accelerated GHG emission reductions, offers substantial cost savings, permits opportunities to reduce emissions from other sources, and provides a more realistic path forward in transitioning away from fossil fuels.

The City looks forward to a continued working relationship with CARB staff throughout the rulemaking process and asks that these comments be considered when making updates to the draft rule language. Please do not hesitate to contact me if you wish to discuss this further. I can be reached at (951) 736-2232 or by e-mail at Jason.Marcia@CoronaCa.gov.

Sincerely,

DocuSigned by:

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Jason Marcia
Fleet Services Superintendent
City of Corona, Public Works Department