

Truck Regulation Implementation Group Rule Provisions Workgroup

December 8, 2023

Background

The California Air Resources Board (CARB) hosted a public Truck Regulation Implementation Group (TRIG) meeting to discuss the Advanced Clean Fleets (ACF) rule provisions. This was the first meeting of the Rule Provisions Workgroup. The purpose of the meeting was as follows:

- Discuss best practices for ACF implementation consistent with regulation language.
- Identify rule provision topic areas that stakeholders need clarification.
- Identify the main concerns for fleet owners/operators.
- Develop recommendations and action items on selected topic areas.
- Facilitate constructive dialogue to address key implementation issues.

The meeting was recorded and is available at:

<https://www.youtube.com/watch?v=DEvxQForlqY>

Pre-meeting poll results on biggest challenges

To help focus the discussion of the first meeting, a poll was emailed to the rule provisions members prior to the meeting. The poll asked each of the members to rank which of the rule provisions create the biggest challenge for fleet owner/operators.

The top three responses were:

1. Infrastructure Delay Extension
2. Zero-emission vehicle (ZEV) Purchase Exemption
3. Daily Usage Exemption

Meeting Summary

The meeting focused on the top two challenges identified in the pre-TRIG meeting poll, the Infrastructure Delay Extension, and the ZEV Purchase Exemption. Staff provided a presentation summary of each provision to facilitate the discussion. The following are summaries of feedback received for each provision and generally do not include comments questions being discussed by other TRIG workgroups.

Infrastructure Delay Extension feedback:

- How will the regulation address the availability of a network of stations to support trucking in regional and long-haul applications?
- Untenable contracts for fleet customers for site electrification and how to hold utilities accountable?

- What's reasonable to ask fleets who depend on public infrastructure?
- Lease parking lot owners being able to electrify but refusing too, fleet unable to break lease.
- Extensions that require a purchase agreement need flexibility.
- Additional clarity on when the purchase order must be placed.
- What are the steps for fleets with multiple facilities to be eligible for these extensions?
- Can they get a list of utility direct contacts, so they don't continue to get silence or the run around?

ZEV Purchase Exemption comments:

- Members want a continuously updated document of available ZEVs.
- Clarification on how ACF defines vehicle configuration vs application.
 - Does vehicle configuration, such as ancillary equipment that must be added in the aftermarket, get consideration?
- Has CARB considered any exemptions for ZEVs that enter a refinery's loading racks?
- Need definitions of "commercially available/available to purchase" and establish a list of criteria that identifies what is needed to determine commercially available.
- Challenges of purchasing from a low volume manufacturer and can they support the maintenance for the vehicle's life?
- What combustion vehicles can a fleet buy come January 2nd and stay in compliance?
- Is Assembly Bill 1594 considered in ACF?
- Some ZEVs with certain outfitted body types are not Occupational Safety and Health Administration approved/safe to operate as needed.
- When is the earliest someone can apply for an exemption without having to wait until the last minute and then must buy all vehicles at one time?
- State and local government fleets – seek clarification on age of vehicle requirement to determine compliance options and when to opt in (e.g. provide guidance that there is no requirement to end the use of existing compliant vehicles)

Future Meetings

Members were asked for feedback and to provide suggestions for future meetings. Those comments and suggestions included:

- Provide clarity on how the rule will be administered.
- Address the real challenges the end users are facing to meet compliance requirements.
- Avoid non-compliance due to misunderstandings.

- Make it easier to understand and comply for the construction industry.
- Consistency in responses to questions so everyone has the same understanding of what the regulation requires.
- Identify frequently asked questions (FAQs) that haven't been addressed yet and modify any existing FAQs with input from the group to make more useful.
- Create very specific and standardized structure/expectations for each meeting.
- Send specific itemized agenda of what will be discussed during each meeting in advance and attach all the resources for each meeting topic.
- Schedule out all the TRIG meetings for the year and send those out to all members.
- Create a Google Document on a shared drive to be able to link it to each meeting and share it with the members so they can answer specific questions CARB asks them in advance (i.e., gaps in FAQs, what is not clear, vehicle body types common vs not).
- Create a meeting with the four workgroups Chairs to discuss issues raised at the Rule Provisions Workgroup and trade items for each other to take care of.
- Schedule a bridged meeting between the Infrastructure Workgroup and the Rule Provisions Workgroup.
- Include broad utility representation at future meetings.

Action Items

- Schedule joint workgroup meeting with Infrastructure subcommittee.
- Create a Google Document to solicit feedback from members before each meeting about specific questions on topics that need further clarification.
- Create a standardized meeting structure with agenda for each meeting.

Members In Attendance

- Rebecca Schenker, Gladstein, Neandross & Associates a TRC Company , co-chair
- Bradley Northup, City of Carlsbad, co-chair
- Gerald Berumen, CARB, co-chair
- Chelsea Danielson, CARB
- Jimmy Steele, CARB
- Tony Brasil, CARB
- Bret Stevens, Daimler Trucks
- David Clifford, Ventura Transfer Company
- Don Jones, City and County of San Francisco
- Emily Lemei, Northern California Power Agency
- Harmony Gates, Yorke Engineering
- Jaimie Levin, Center for Transportation, and the Environment
- Jason Stepke, Hyundai-Kia America Technical Center, Inc.

- Jon Constantino, California Council for Environmental and Economic Balance
- Kristina Corby, California Electric Transportation Coalition
- Lacy Robertson, Rush Enterprises
- Marty Tufte, Waste Management Corporate office
- Matt Mesick, Isuzu Commercial Truck of America
- Michael Lewis, Construction Industry Air Quality Coalition
- Mike Gabbert, Raley's Family of Fine Stores
- Mike Tunnell, American Trucking Associations
- Morgan Mitchell, Westside Water Authority
- Nick Blair, Association of California Water Agencies
- Paul Rosa, Penske
- Rick Albertini, Phenix Truck Bodies & Van Equipment
- Sarah Deslauriers, California Association of Sanitation Agencies
- Steve Nelson, Local regional trucking based in Monterey County
- Suzanne Seivright-Sutherland, California, and Industrial Materials Association