

**Comment 1 for AB179 Joint Meeting with CARB/CTC/HCD  
(ab179carbctchcd2022) - Non-Reg.**

First Name: ADRIAN

Last Name: GUERRERO

Email Address: contabilidad.alpitransport@gmail.com

Affiliation:

Subject: firm for natural gas tractors

Comment:

firm for natural gas tractors

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 16:46:00

No Duplicates.

## **Comment 2 for AB179 Joint Meeting with CARB/CTC/HCD (ab179carbctchcd2022) - Non-Reg.**

First Name: Ryan

Last Name: Collins

Email Address: rcollins@waste101.com

Affiliation: Tahoe Truckee Disposal Co Inc

Subject: ZEV Concerns for High Elevation Operations

Comment:

Good afternoon,

We are a small solid waste hauler and processor servicing the Tahoe, Truckee, Sierra community. We respectfully submit our comments and concerns for truck electrification in high elevation areas and for solid waste collection vehicles.

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Cold Weather

Battery Issues

o

Range can be

reduced by 10-40% in the winter due to Lithium-Ion performance issues in cold weather, battery heating, and extended hydraulic system warm-up periods.

o

Due to our

fleet being stored outside, winter charging will be a significant challenge as trucks can sometimes be buried in over 6 feet of snow overnight. Plowing operations and clearing will threaten to clip wires and safety risk is a major concern.

o

Lithium battery

charging below 32 degrees Fahrenheit can cause "lithium plating," a chemical reaction that increases the internal resistance of the battery and ultimately causes a permanent reduction of the battery's capacity. Most of our charging would occur below 32 degrees (we experience consistent nighttime temperatures below freezing in winter and shoulder seasons).

o

Charging speed

can be reduced significantly in cold weather. Charge current must be reduced below 41 degrees Fahrenheit because of reduced diffusion rates. We are concerned that trucks may not be able to achieve a full charge overnight.

o

On-road safety

is a major concern during winter months. Many times, road closures due to storms and avalanches have left our vehicles stranded for hours and can occur at the end of the day. Last winter, road closures led to passenger electric vehicles running out of charge, stranding passengers, and requiring a major local towing effort. We fear that drivers could be similarly stranded without heat in a blizzard should they find themselves facing a road closure at the end of the day.

## Grid Capacity and Outages

- o Our current grid can barely support building infrastructure, we will need to install higher capacity lines to support electrification.

- o Power outages can occur for long durations. Last year we had over 25 days without grid power, with 6 of those days being continuous, not to mention intermittent grid power. Generators currently only support critical building functions (for example, only half of the MRF is powered during an outage) and a significant number of generators and battery banks would have to be installed to support fleet charging during outages.

## Technology and Cost

- o The high torque required to service the mountain community will reduce range (This is one reason our fuel burn per mile is generally higher than industry). Some roads that we operate over can be around 15% grade.

- o Lithium-Ion batteries experience more rapid degradation when charged to 100% capacity. This is why passenger electric vehicle manufacturers warn against charging over 80% and why most civilian charging stations slow charging after 80%. We are concerned about range if trucks are only charged to 80% and about battery degradation if charged to 100%.

- o We are not aware of any current electric trucks with soft-start functionality. The high torque of electric vehicle motors can cause issues in slippery conditions and transition from ice to dry pavement could result in drive-train damage.

- o We have reviewed most of the currently available vehicles and none demonstrate the necessary electrical capacity to support a full operating day.

- o It will be a challenge to service rural routes that can require over 100 miles of travel to and from the route (50 miles to route start, 50 miles to MRF).

- o We are concerned about having adequate electricity for the collection of materials like pine-needles and Greenwaste, which require the truck packer to be running near constantly throughout the day.

- o The added weight of the electrical system significantly reduces the hauling capacity of vehicles, requiring more vehicles to support normal route operations.

- o Specialized electric trucks will constrain parts availability and aftermarket options. This could cause delays and extended vehicle down time (already an issue with current electric truck systems).

- o Specialized electric trucks will require significant mechanic training, repair infrastructure, and cost.

- o We are not aware of any current electric trucks that have swappable batteries. This is an issue for operations as a truck will have to return to base to charge when power is low. It is also an issue for battery replacement, as the truck will have to be shipped to a broker

capable of replacing the battery at the end of its useful life.

o We received a quote from our broker for a "front loader" and it's estimated to be around \$1 million, not including charging infrastructure. An equivalent diesel-powered front loader currently costs close to \$580,000. This will significantly increase costs to rate payers.

We hope that our comments can be of use in reviewing the merits and challenges of truck electrification.

Thank you,  
Ryan  
TTSD

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-20 16:00:05

No Duplicates.

### **Comment 3 for AB179 Joint Meeting with CARB/CTC/HCD (ab179carbctchcd2022) - Non-Reg.**

First Name: Connie

Last Name: Burke

Email Address: clcairns@hotmail.com

Affiliation: Concerned Citizen

Subject: Regulations impacting new car purchase out of state

Comment:

Hello,

My name is Connie Burke. I have been born and raised in Southern California and am very upset about some recent regulations I learned about that have impacted my family.

My husband and I work extremely hard to afford life here in Southern California as a young millennial family with a small toddler and newborn. With a newborn, we decided my compact car that I have had for 10 years was no longer going to be able to serve our needs as a family of four and we decided to purchase a SUV. I did a tremendous amount of research and found it was more cost effective for us to purchase a new 2022 vehicle than purchase a used vehicle and found a great price on the vehicle we were looking for in Arizona.

Obviously, travelling to Arizona with a newborn and toddler isn't ideal so we went to a local Southern California dealership that had the same vehicle and tried to negotiate a fair price. They wanted over \$7000 more than the dealership in Arizona. With that large difference in costs, we decided to move forward on the vehicle in Arizona after carefully reading the DMV website and confirming the vehicle was 50 state certified and had the emissions sticker.

We brought the vehicle home and I then had the surprise of finding out that my brand new vehicle needed to get a smog check before the DMV would issue the registration. I took the vehicle to be smogged, paid almost \$50 out of pocket to be told the vehicle was not ready to be smogged. I had a long conversation with the smog tech and then a long conversation with the car dealership who both confirmed, the car is too new to be smogged and needs to be driven. The dealership recommended I wait until I had 1000 miles on the vehicle before completing a smog check. I only drive 3000 miles a year.

To make this clear, I now have to purposely go out to drive my brand new vehicle to get the miles on it to be able to be ready to be smogged. That is wasting my time, gas (which is extremely costly right now), money and bringing unnecessary emissions to get this vehicle to be at a point where it's ready for a smog check. And I will now have to pay for a second smog test, directly impacting the bottom line on my family finances, again.

If this exact same vehicle had been sold to me in CA, it wouldn't have to be smogged. It's not like the state isn't getting their money from the sale - I have to pay the difference in the sales tax, have to pay the DMV for the title transfer and registration/license fees.

I can understand the need for a smog if this was a used vehicle coming in from out of state, but this is a brand new vehicle. The

state doesn't require a smog check on new vehicles for a few years.  
I'm hoping I can make you see how illogical it is to reasonable  
people like me that you require a smog check on a brand new, 50  
state certified vehicle and how it costs a middle class family like  
mine precious time and resources.  
Please consider changing the regulations.  
Best,  
Connie

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-23 09:36:05

No Duplicates.

**Comment 4 for AB179 Joint Meeting with CARB/CTC/HCD  
(ab179carbctchcd2022) - Non-Reg.**

First Name: Brad

Last Name: Jensen

Email Address: Bradley.Jensen@cao.sbcounty.gov

Affiliation:

Subject: Comments on Advanced Fleet Regulations

Comment:

Attached is a comment letter from the San Bernardino County  
Board of Supervisors on the proposed Advanced Fleet  
Regulations.

Best regards,

Brad Jensen

Director of Legislative Affairs

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-  
ab179carbctchcd2022-BXYCZVU6AAwHYwJn.pdf'

Original File Name: San Bernardino County - Comments on CARB Advanced Fleet Regulations  
10 24 22.pdf

Date and Time Comment Was Submitted: 2022-10-24 12:45:57

No Duplicates.

**Comment 5 for AB179 Joint Meeting with CARB/CTC/HCD  
(ab179carbctchcd2022) - Non-Reg.**

First Name: Sasha

Last Name: Zbrozek

Email Address: zbrozek@zlnp.net

Affiliation:

Subject: Opportunities for emissions reduction via land-use policy

Comment:

It's wonderful to see these three major institutions coming together to address challenges within California. Thank you.

While California's institutions are generally cognizant of and taking action to address direct causes of emissions, we're not doing as well on proximate causes. Where we live, where we work, and what amenities are nearby are huge drivers of transportation demand and thus emissions. Please consider taking some actions that could help address the gap:

Use the RHNA process to address VMT. Right now there is no requirement for municipalities to address housing:jobs:amenities ratios as part of the RHNA process. Without that, we're unlikely to see VMT per capita improvements even if we do someday see improvements in housing affordability.

Leverage new state laws liberalizing land-use near transit. A recent bevy of state laws reduces land-use restrictions in proximity to transit. As we build new transit, in addition to thinking about where it might serve existing communities it should be considered how it might enable new housing. Most of these laws empower projects within half a mile of transit.

Create and publicly release a high-quality VMT dataset. Direct energy use seems to be studied to death, but there's little publicly-available data to help model VMT impacts of land-use policy decisions. Personally, I suspect that building missing-middle housing even if it depends on cars can dramatically drive down VMT so long as it's well-located relative to jobs and amenities. Unfortunately, my guess is no better than anybody else's without good data to support it. Produce the data and make it easily available to enable better thinking.

Thank you,  
Sasha Zbrozek

P.S. for CARB: Please sunset CaRFG in favor of Federal RFG. That standard is pretty good already, and with the passage of phase 3 will exceed California's standards. Harmonizing will reduce prices and improve market efficiency.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-24 19:59:44

No Duplicates.

**Comment 1 for AB179 Joint Meeting with CARB/CTC/HCD  
(ab179carbctchcd2022). (At Hearing)**

First Name: Ian

Last Name: Griffiths

Email Address: ian@seamlessbayarea.org

Affiliation: Seamless Bay Area

Subject: Comment Letter - Item 2 (CAPTI) Update

Comment:

<p>Please see attached comment letter on Item 2 (CAPTI) for the  
Joint HCD-CARB-CTC Meeting from Seamless Bay Area, SPUR, TransForm,  
and Bay Area Council.</p>  
<p>Ian Griffihts</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ab179carbctchcd2022-WmhSZAY1VTQDKAEw.pdf>

Original File Name: 2022-11-02 CARB-CTC-HCD Joint Meeting (2) (1).pdf

Date and Time Comment Was Submitted: 2022-11-03 09:34:10

No Duplicates.

**Comment 2 for AB179 Joint Meeting with CARB/CTC/HCD  
(ab179carbctchcd2022). (At Hearing)**

First Name: Tanya

Last Name: Williams

Email Address: twilliams@rialtoca.gov

Affiliation:

Subject: Comment from the City of Rialto

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ab179carbctchcd2022-BW9QOQRsAD1SIAdY.docx>

Original File Name: Joint meeting statement 11.3.22\_Rialto (1).docx

Date and Time Comment Was Submitted: 2022-11-03 11:26:13

No Duplicates.