

September 15, 2025 | Submitted Electronically

Liane Randolph, Chair
Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: Comments on Proposed Public Fleets Advanced Clean Fleets Rule

Introductions

The City of Shasta Lake (COSL) appreciates the opportunity to comment on the July 29, 2025 45-day regulatory package of the California Air Resource Board's (CARB) Advanced Clean Fleets (ACF) rule for public fleets ("proposed rule"). COSL is a city in Shasta County that provides electricity, sewer, and water utility services to its community. The city is governed by an elected 5-member board who all reside within the city limits. The city is relatively small, only 11 square miles, and when compared to the statewide demographics, the city's population of 10,250 tend to be poorer, have higher concentrations of poverty, lower household incomes, lower per capita incomes, and higher proportions of age groups that typically aren't in the workforce (i.e., minors and seniors). COSL serves this disadvantaged community through these critical infrastructure utilities, and other city functions, with less than 60 fulltime equivalent employees.

COSL is a member of both the Northern California Power Agency and the California Municipal Utilities Association. COSL fully endorses the comments submitted by these agencies and respectfully submits the following for your consideration.

COSL filed comments by letter dated April 7, 2023 in response to CARB's 15-day regulatory packet on ACF.

A Recap of COSL's Overall Concerns with ACF

Public Fleets operate medium and heavy-duty (M&HD) vehicles to perform their duties as critical infrastructure providers. COSL operates electric, water, and wastewater utilities. Its M&HD fleet includes the vehicles used by each department, including the public works department, who maintain the City's water distribution system and wastewater lift stations and sewage forced mains. While we spend a significant amount of time performing asset inspections and maintenance, critical and emergency events still happen. When this happens, we have very little margin of error. We must be able to act immediately and provide sustained attention to resolve the issue. We're confident that ACF will not increase our fleet capability in this regard. However, we're strongly concerned that applying the ACF regulations, even with the exemptions, our response capabilities will degrade with each ACF-compliant vehicle we add to our fleet. We don't see the upside of a mandate like ACF at this time. It seems like a big gamble to potentially degrade critical infrastructure fleets and we ask CARB to strongly consider whether this is the right time to impose

such a mandate given what's at stake. Moreover, it seems a one-size-fits-all mandate is not a good fit given the diversity of geography and other risk factors that public fleets operate within the State.

Cost Limitation Provisions Are Sorely Needed in the ACF

ACF, as drafted, makes no recognition of the cost differential between traditional M&HD work rigs vs. the technology CARB is wishing to promote through the ACF. Cost limitations are sorely needed, and CARB should introduce such provisions in the ACF. COSL presented a longer discussion in its previous comments. COSL supports this round of comments from both CMUA and NCPA regarding "affordability." Below, we add a little more color as it pertains to COSL's community.

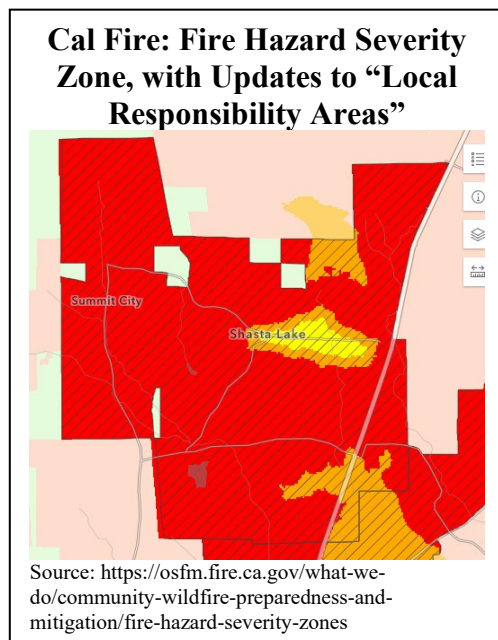
About 75% of the COSL community is considered "disadvantaged" when based on income statistics. When COSL incurs fleet costs, those costs are ultimately borne by this very same community. As stewards of public dollars, our fleet decisions are always cost conscious. Our focus on cost is even greater given our community demographics. Forcing these community members to support M&HD rigs with ACF-compliant technology at more than double or triple the cost than that of established technology seems arbitrary and otherwise unjustified.

California is A Diverse Place, and One-Size-Fits-All Mandates Rarely Are A Good Fit

COSL discussed some of the big events our community has endured, our staff was dispatched to, and the punishment we placed on our rigs. This includes two FEMA disasters, the Carr Fire (2018) and the Winter Storms (2019) that wiped out over 20 counties. At the time, these were unprecedented events for our community and our COSL operations. We said it before, and we'll say it again here, we're proud of how our staff responded to the community's needs during these events.

In January, 2025, Cal Fire published updated "Fire Hazard Severity Zone" assessments for COSL, and other "Local Responsibility Areas." As shown at right, Cal Fire has assigned its highest risk factor rating, "Very High," shown in red, to the vast majority of COSL. Under this new map, about 95% of COSL's footprint is designated either "High" or "Very High." The green areas within COSL's footprint are Federal lands that Cal Fire did not assign a fire hazard rating.

COSL has experienced critical events on massive scale in the past, and another State agency highlights the risks the natural landscape and climate pose to this community. We ask CARB to consider the works of its sister agencies when crafting CARB rules and regulations. The State's work products should work together.



Responding to critical events and emergencies requires immediate and decisive action. Immediate response can prevent an event from growing into a catastrophic event, and this is especially true with wildfire risk. Rapid response is key. Our M&HD rigs must support this. It seems imprudent

to use areas with our experience and State-identified risks as a proving ground for ACF-compliant technology. Therefore, we ask CARB to consider exempting from ACF mandates portions of a public M&HD fleet that primarily (i.e., 50% or greater) serve areas designated by Cal Fire as “High” or “Very High” Fire Hazard Severity Zones.

The Big Picture

COSL recognizes the significant task before the CARB, other state agencies, and public fleets. However, COSL asks the CARB Board to resist being myopic on this matter. We understand that your organizational purpose is to act on air quality matters, but your policy decision here will have far reaching implications. Utilities are faced with numerous goals promulgated by the State through laws and the works of multiple regulatory agencies. The combination of these rules should be feasible to implement and should recognize the risks, challenges, and burdens. Let’s try to avoid the avoidable, negative, severe consequences. If the final ACF mandate proves to be inflexible, reduces operational capacity in utility fleets, and wastes public resources (i.e., costs vs. capability), that seems like a list of bad outcomes that all stakeholders should shun. We also believe we must keep our eye on the biggest goal: that we fulfill our fiduciary responsibilities to the Californians that we serve. We can make significant progress to your charge and core mission without causing substantial harm elsewhere, and your decision making should be able to promote multiple goals at once. This is especially true in recognizing and honoring the role public fleets play in responding to critical events and emergencies.

Conclusion

COSL again expresses its appreciation for this opportunity to comment on the CARB’s public fleet Advanced Clean Fleet proposed rule. COSL is a small organization that provides water, wastewater, electric services, among other city functions, to a disadvantaged community in Northern California. Recently, Cal Fire designated 95% of COSL’s footprint with “High” and “Very High” fire hazard severity rankings highlighting that not all geographic areas within California are equal. COSL is concerned that the proposed rule will diminish COSL’s ability to adequately fulfill its duties in electric, water, and sewer utility operations and does not reflect recent risk assessments from other State agencies. COSL believes locally elected governing boards, who are held directly accountable by the community through the election process, are best equipped to decide how the public fleet should be configured. After all, it is the people who work and live in California who will bear the burdens that fall out from this policy.

Sincerely,

CITY OF SHASTA LAKE



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City Manager

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