

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
OFFICE OF RISK MANAGEMENT
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October 13, 2022

File No.: 074.16428.SCH # 2021020340



California Air Resource Board
Attention: Gabe Nevin
1001 I Street 23rd Floor
Sacramento, CA 95814

RE: SCH # 2021020340

Dear Mr. Nevin,

The California Highway Patrol (CHP), Fleet Operations Section, has received the “Notice of Completion and Environmental Document” for the Advanced Clean Fleets project. This project is detailed under State Clearing House number 2021020340. After reviewing the project, the CHP has concerns with the potential impact this project will have on our ability to carry out our mission in providing the highest level of safety, service, and security to the people of California.

Specifically, our concerns relate to five vehicles within our fleet which would be impacted by the strategies detailed within the project. All of these vehicles are 2-axle International trucks. Four of these International trucks tow large trailers. Two of the International trucks tow trailers containing the CHP’s Mobile Consolidated Communications Center’s (MCCC). These MCCC’s are utilized during emergencies such as earthquakes, floods, fires, civil disturbances, or in any event their use is deemed necessary. These MCCC’s serve as a mobile command post for the CHP to utilize in effectively mitigating these types of incidents.

Two additional International trucks are utilized by the CHP’s Supply Services Unit (SSU). The SSU provides supplies from a warehouse in West Sacramento to CHP offices statewide. The SSU stocks first aid supplies, emergency medical technician supplies, personal protective equipment supplies, automotive supplies, and civilian protective supplies, all of which are critical in emergency incidents to protect life and property. It is critical these supplies are delivered as quickly as possible. The final International truck is utilized by the Special Weapons and Tactics team to deploy in the event of an immediate threat to public safety.



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While the latter vehicle contains emergency lighting and is exempt under section (b) of California Public Resources Code 25722.11, the other vehicles do not contain emergency lighting and are often times operated by non-uniformed employees. Nevertheless, these vehicles are critical in ensuring the CHP achieves its duty of maintaining a high degree of preparedness in the event of an emergency.

Given the current infrastructure in place for zero-emission vehicle (ZEV) trucks, the technology surrounding their limited range of travel, and the CHP's response to remote areas within the state that do not have ZEV infrastructure in place, this project could have a negative impact on our ability to carry out our mission.

If you have any questions regarding the CHP's concern, please contact me at (916) 309-6800.

Sincerely,



M. B. TIMMONS, Captain
Commander

cc. Office of the Commissioner
Administrative Services Division