



## Board of Supervisors

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April 7, 2023

Mr. Craig Segall  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

### **RE: Comments on Proposed Advanced Clean Fleets Regulations for State and Local Government Agency Fleet Requirements**

Dear Mr. Segall:

On behalf of Riverside County, we appreciate the opportunity to provide comments on the California Air Resources Board's (CARB) proposed ACF regulatory language for public fleets. While the latest iteration of the ACF regulations reflect some of the exemptions and extensions that have been requested, we remain seriously concerned with the following and must request further amendments accordingly:

#### **Exemption Clarifications**

In addition to emergency vehicles currently defined in the California Vehicle Code, the following local agency vehicles must be operable 24 hours per day, 365 days per year. Any interruption in their regular use could jeopardize health and safety. The reliability of zero emission vehicles (ZEV) will depend upon a consistently accessible source of electricity, the risk of disruption during a natural disaster, be it an earthquake, public safety power shutoff, rolling brownout, wildfire, or flood, is too great to risk the operability of these vehicles. To maintain the health and safety of our residents during emergency scenarios, we recommend adding the following exemptions:

- Valve trucks, welding trucks, and other vehicles essential to the repair and maintenance of flood control channels. These are particularly critical during and following the very events that could interrupt the ability of ZEVs to operate.
- Vehicles used by transportation, open space, regional park, and other agencies to spot wildfires, mitigate wildfires, rescue lost or injured hikers, and prevent poaching of animals.
- Vehicles used by mosquito abatement and vector control agencies to prevent and disrupt the proliferation and uncontrolled spread of dangerous known and unknown vectors.

#### **Procurement Challenges**

Public agencies must follow the Public Contract Code, which involves more robust processes, including budget approvals, solicitation, procurement, design, permitting, and construction. These processes affect the proposed schedules and make meeting deadlines more challenging. Additionally, when multiple agencies are chasing the same resources, supply and demand challenges further inflate costs and push back delivery times.

Funding for a project to install even a single charging station for electric vehicles (EV) 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, project management and electricity costs. The purchase requirements do not provide public agencies enough time to effectively budget or procure the necessary fleet and infrastructure development.

ZEVs in all classes of vehicles remain difficult to procure. Even when manufacturers have available quantities the additional markup due to widespread shortages have made vehicle acquisitions across all classes more expensive. Vehicle manufacturers have been backlogged and unable to accept additional orders. Advanced forecasting and purchasing flexibility will be necessary in planning for fiscally responsible vehicle replacement. It has been challenging to find available and comparable replacement vehicles that can be delivered in a timely manner.

We recommend that CARB consider exemptions for vehicles based on a maximum percentage price as compared to traditional vehicles. Local governments strive to be good stewards of taxpayer dollars, but without a percentage price exemption, the proposed regulations may result in ZEVs that are put to market at an artificially inflated rate. A percentage price cap would potentially prevent manufacturers from manipulating the market, helping local governments protect taxpayer resources. An exemption should apply if the ZEV price exceeds 5% of the cost of a similar traditional vehicle.

### **Infrastructure Gaps in Rural Communities**

We urge that the regulations consider areas in which EV infrastructure creates insurmountable funding issues for local governments. California's vast geography creates challenges to building out EV infrastructure. The ability to meet electrification standards will vary vastly based on geography, population, and existing infrastructure. Although there are some funding opportunities available, the resources are not deep enough to make the necessary investments to cover the excessive cost of electrifying our rural communities. These communities are already struggling to build basic infrastructure, this puts greater cost burdens on already under resourced communities.

With over 7,300 square miles of territory, Riverside County will require a substantial shift in labor and resources to build and operate the infrastructure necessary to meet the needs of a ZEV fleet. The vast geography of our County makes the need for "backup vehicles" greater. In an emergency event the County must be able to deploy vehicles to even the most remote areas, where EV infrastructure does not exist. We would like clarification that "backup vehicles" as specified in section 2013.1 (a). do not count against the "fleet" calculation.

### **Financing**

The proposed regulations ignore existing market realities and the time needed to develop and ramp up the infrastructure and systems necessary to support a ZEV fleet. If required to comply with the proposed regulations as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. There is no current funding mechanism for

these increased costs. We encourage the State of California to develop population and needs based funding allocations to support local government compliance.

Thank you for allowing us the opportunity to provide written responses to the proposed ACF regulations. Should you have any questions regarding this letter of support, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or [csherrera@rivco.org](mailto:csherrera@rivco.org).

Sincerely,



Kevin Jeffries  
Chair, Riverside County Board of Supervisors

cc: Riverside County Legislative Delegation  
California State Association of Counties