



Gateway to the Redwoods

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October 12, 2022

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

RE: League of California Cities Comments on the Draft ACF Public Fleets Regulatory Language

The City of Willits appreciates the opportunity to provide comments on the Advanced Clean Fleets (ACF) draft regulatory language (September 2 iteration) for public fleets as presented at the California Air Resources Board's (CARB) July 26 public workshop.

Given that zero-emission vehicle (ZEV) availability is critical to the successful implementation of the ACF rule, we have focused on these provisions in our comments. Our core recommendations are for CARB to include a robust, transparent framework to assess ZEV commercial availability, as well as a separate exemption process when ZEVs are not accessible to public agencies in practice or are unsuitable for the fleet's operational needs.

The proposed regulations ignore existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles.

For example, existing zero-emission technology limits a garbage truck's range to 100 miles or less, with a payload loss of 6,000 to 7,000 pounds. This reduction in payload capacity, combined with the time needed to charge a truck, means that agencies would need two garbage trucks for each one in service, significantly increasing costs for both vehicle infrastructure and labor.

Many of these vehicles are not commercially available. If a city has planned for supporting infrastructure and budgeted for such purchases, it should be recognized by CARB and receive an extension for compliance instead of being penalized for vehicles not yet available. The proposed regulations should also be modified to ensure that established and reliable manufacturers can adequately produce and service these vehicles for years to come.

If required to follow the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. Cities across the state are pursuing environmentally sound and robust strategies to decarbonize their communities. However, this proposed regulatory language does not account for rising utility costs, and substantial mandates from multiple regulatory bodies, so we urge CARB to consider these impacts to ensure success for communities without further exacerbating the affordability issues facing many of our cities and residents.

The City of Willits is currently in the design phase of our "Rails with Trails" program. This trail is a 1.6-mile path that will extend from E. Commercial Street (north end of Willits) to East Hill Road (south end of Willits). The City anticipates with the completion of this trail, it will encourage additional trails.

Willits is a small community but has a large portion of our residents that either walk or ride bicycles, which is already contributing to help with our carbon footprint. The City looks forward to continuing to create successful projects like this.

Again, thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Sincerely,

A handwritten signature in blue ink that reads "Cathy Moorhead". The signature is fluid and cursive, with the first name "Cathy" being more prominent than the last name "Moorhead".

Cathy Moorhead
Assistant City Manager
City of Willits

cc:

League of California Cities (via email: cityletters@calcities.org)