



CITY of CYPRESS

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October 13, 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 Cypress appreciates the opportunity to provide comments on the Advanced Clean Fleets (ACF) draft regulatory language (September 2 iteration) for public fleets. 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.

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. Additionally, many of these vehicles are not commercially available. The proposed regulations should be modified to ensure that established and reliable manufacturers can adequately produce and service these vehicles for years to come. We also recommend that CARB 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.

Cities across the state are pursuing environmentally sound and robust strategies to decarbonize their communities. Just this past month the City of Cypress added 16 electric vehicle chargers to our recently opened Lexington Park and plans to add additional electric vehicle charging stations at all City facilities in the coming year. Cypress is installing these stations in an effort to meet the State's goal of five million zero-emission vehicles on the road by 2030 and 250,000 EV charging stations by 2025.

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

Sincerely,

Peter Grant
City Manager

Cc: Cypress City Council
League of California Cities (via email: cityletters@calcities.org)

Paulo Morales, Mayor

Anne Hertz-Mallari, Mayor Pro Tem

Frances Marquez, Ph.D., Council Member

Scott Minikus, Council Member

Jon E. Peat, Council Member