



## CITY MANAGER

October 13, 2022

California Air Resources Board  
Liane Randolph, Chair, California Air Resources Board  
California Air Resources Board Members  
1001 I Street, 6<sup>th</sup> Floor  
Sacramento, CA 95814

### **Re: Comments on Proposed Advanced Clean Fleets Regulations**

Chair Randolph,

Thank you for the opportunity to provide public comments to the California Air Resources Board (CARB) draft language for the Advanced Clean Fleets (ACF) Regulation High Priority and Federal Fleet Requirements. After reviewing the proposed language, there are potential outcomes that will negatively impact the City's ability to continue providing high-quality service to its residents. As such, I request that the ACF regulation is postponed until additional planning and coordination are performed.

By way of background, El Cajon is the sixth largest city, of eighteen, in San Diego County and the largest City in the East County region. The City is a full-service City that operates and maintains its own fleet division, wastewater, sewer, streets, fire, and police departments. Collectively the ACF regulation will impact over 100 vehicles, which is over one-third of the City's total fleet inventory.

The City supports CARB's goals of "developing a medium and heavy-duty zero-emission fleet regulation with a goal of achieving a zero-emission truck and bus California fleet everywhere feasible." However, the ACF regulation creates an unrealistic expectation for a medium sized City to meet when taking into consideration the following impacts:

1. Cost of Electric Vehicles: In most instances, the price of electric vehicles is up to 50 percent greater than a gas/diesel vehicle. The cost increase is not budgeted in the City's long-range forecast, nor will it be affordable.
2. Service Delivery Impacts: Large electric vehicles do not have the service delivery capacity to maintain the same level of service as their gas/diesel counterparts. In order to maintain that same level of service, the City will have to purchase twice as many electric vehicles, which is an even more significant financial burden to the City.

3. Acquisition Delays: As it currently stands, it takes up to 12 months to receive a gas/diesel vehicle from the point of order. If the City could move forward and purchase the vehicles to meet the proposed 2024 deadline, it will not be reflected until one to two years later and thereby cause the City to not comply with that deadline.
4. Electric Charging Infrastructure: Assuming that the City can afford to transition to an entirely electric fleet, there is an additional cost to design and construct the necessary number of charging stations to support all new vehicles. This is another unfunded requirement that the ACF regulation will have on cities without any identified funding source to afford it.

The City respectfully requests that ACF regulation is paused until a detailed and forward looking Electric Vehicle Acquisition and Implementation Plan is performed. This plan should consider many impacts, some of which include:

- Create a realistic timeline that does not ignore market realities and limitations, to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles.
- Identify a reliable electricity supply that can provide for the total number of new electric fleet vehicles created throughout the State.
- Work with all likely vehicle manufacturers to ensure the demand can be adequately produced.
- Create a funding source (e.g., grants) for all public entities to use to assist with the purchase of new electric vehicles.

In closing, the ACF regulation is a noble effort to further transition gas/diesel fleets to electric; however, the unrealistic deadlines of the proposed language create an insurmountable barrier that no City will be able to comply with. Please postpone the ACF regulation and consider creating an implementation plan as described above.

Thank you for the opportunity to contribute to the development of a successful Advanced Clean Fleet program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Graham Mitchell", with a stylized flourish at the end.

Graham Mitchell  
City Manager