



# CITY OF SIMI VALLEY

*Home of The Ronald Reagan Presidential Library*

October 14, 2022

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

## **RE: Comments on the Draft ACF Public Fleets Regulatory Language**

The City of Simi Valley appreciates the opportunity to provide comments on the September 2, 2022 version of the Advanced Clean Fleets (ACF) draft regulatory language 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 and viability, 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 heavy duty, water, and sewer utility vehicles.

The current zero emission technology has significant limitations that in many cases, would require two vehicles to provide the same service. For example, existing zero-emission technology limits a heavy duty truck's range to less than 150 miles, with a light payload. Add the upfit equipment to these trucks (i.e. vactor equipment, lifts, lighting, tools), combined with the time needed to charge a truck, means that agencies would need two heavy duty trucks for each one in service, significantly increasing costs for both vehicle infrastructure and labor. Simi Valley cannot afford to duplicate our fleet.

Importantly, many ZEV Heavy-duty trucks are not yet commercially available. If a city has planned for supporting infrastructure and budgeted for such purchases, Simi Valley requests the proposed regulations be amended to provide a community an extension for compliance instead of being penalized for vehicles that are not yet available. Heavy equipment are costly purchases for cities and reliability is a necessity. The City requests that the proposed regulations be modified to ensure that established and reliable manufacturers can adequately produce and service these vehicles for years to come.

Craig Segall, Deputy Executive Officer  
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Page 2

If required to follow the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial cost increases across multiple public works and utility service departments, and place a heavy burden on the City's General Fund. Other recently implemented legislation has decreased the City's ability to recover costs for services and our General Fund is being required to stretch further than it has in the past.

Recognizing the benefits to the community, and to the bottom line, Simi Valley and cities across the state are pursuing environmentally sound and robust strategies to decarbonize their communities. The City has made a number of improvements to decrease our carbon footprint, including the installation of solar panels at City facilities, back up battery systems to keep City buildings on in the event of power outages and to operate on battery during peak energy periods, convert all streetlights to LED technology, and the implementation of a Compressed Natural Gas Transit fleet, to name a few. The costs and staff time associated with the implementation of these projects meant that the changes had to happen over time once it was confirmed that the available technology could indeed meet the City's needs and be a responsible use of taxpayer dollars. To mandate the replacement of functional in-service fleet vehicles for no other purpose than to reduce carbon emissions is an unnecessary burden on every taxpayer. 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 that when we transition to a ZEV heavy duty fleet, the investment is a wise one.

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

Sincerely,



Brian Paul Gabler  
City Manager

cc: The Honorable Henry Stern  
The Honorable Suzette Valladares  
City Council  
City Attorney  
Public Works Director  
Gonsalves and Son  
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