



October 17, 2022

Sent via <https://ww2.arb.ca.gov/applications/public-comments>

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

Dear Mr. Segall:

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

The City of Pleasanton 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.

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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.

There are many important factors to consider when planning for the impact that these regulations will have on the City of Pleasanton's fleet. The first is vehicle acquisition. ZEVs are more expensive and often require more time to manufacture and deliver than traditional Internal Combustible Engine (ICE) vehicles. Grant and incentive funding can help with the second aspect, but many grants are competitive or first-come-first-served and require careful planning to ensure a successful bid.

While working on acquisitions, fleets must also focus on constructing the infrastructure that will fuel these vehicles, which the City of Pleasanton is currently in the process of working on now with EBCE. Until Pleasanton has the charging infrastructure in place there is no point in purchasing brand-new electric tractors and other vehicles if there's no charging infrastructure in place to power it. Infrastructure planning will be Pleasanton's greatest challenge, because of the timeline being presented by these regulations. Coordinating with utilities, getting permits approved, and engaging general contractors, all of these can be costly and time-consuming projects that can, and often do, take years to complete. The added cost of infrastructure, which often is very significant will have a huge impact. Delaying this process will likely inhibit a fleet's ability to comply with this regulation.

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

Sincerely,



Gerry Beaudin
City Manager
City of Pleasanton

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