



City of Santa Barbara

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Craig Segall
Deputy Executive Officer
California Air Resources Board
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RE: City of Santa Barbara Comments on the Draft Advanced Clean Fleets Public Fleets Regulatory Language

The City Santa Barbara 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.

The City of Santa Barbara has adopted a goal of carbon neutrality by 2035. This goal cannot be met without decarbonization of all sectors of transportation, including public fleet vehicles. It is for this reason that the City is in the process of developing a zero-emission vehicle (ZEV) acquisition policy for our fleet. We are, therefore, supportive of CARB's goals in drafting the ACF rule and hope that with some edits it will be successful. In developing and beginning to implement our own ZEV fleet policy, we have experienced some of the hurdles associated with decarbonizing a public fleet and we offer the following comments for the CARB to consider in modifications to the proposed ACF rule. Given that ZEV availability, functionality, and affordability are critical to the successful implementation of the ACF rule, we have focused on these provisions in our comments.

Many ZEVs are currently difficult to obtain due to limited supply and extended order windows. We note that the proposed legislation would direct CARB to maintain a list of available ZEVs. We recommend that CARB include additional provisions to regularly assess ZEV commercial availability and include additional exemptions when ZEVs are not, in practice, accessible to public agencies within certain timeframes or numbers needed. We also urge CARB to include exemptions when the total cost of ownership of a ZEV greatly exceeds the total cost of ownership of the comparable internal combustion engine vehicle. Without such a limit or additional phasing of implementation, the proposed legislation will lead to significant supply and demand imbalances that could result in very high prices that could greatly affect local jurisdictions.

We also request that CARB further take into account the functional operational requirements of vehicles. The current draft regulation offers an unavailability exemption only if a specific class or type vehicle is not listed on CARB's eligible list. However, a commercially available ZEV may not have the appropriate range or hauling capacity needed to effectively meet the needs of a jurisdiction. Exemptions in the ACF rule need to factor in the suitability of ZEVs to meet all primary functional needs.



Please consider the environment before printing this letter.

Existing market realities of available technology and the time needed to develop and ramp up an infrastructural system that can support a decarbonized fleet, indicate that the initial January 1st, 2024 start date of the regulation may be overly optimistic. Once an affordable ZEV is identified for procurement by a jurisdiction, ample time must be allotted to planning, permitting, financing, and installing of fueling infrastructure over multiple sites. Starting the implementation of this regulation in little more than a year does not allow enough time to adequately plan and install the required support infrastructure. Additionally, phasing of implementation is needed to allow for ramp up in manufacturing of new vehicles and increased training for technicians to adequately service and maintain ZEVs. We request that CARB extend the timeframes for both the 50% and 100% ZEV procurement rules.

Thank you for allowing us the opportunity to provide written responses to the proposed ACF regulations. We hope that our comments will assist CARB in developing a successful Advanced Clean Fleets program.

Sincerely,



Randy Rowse, Mayor
City of Santa Barbara

cc:
League of California Cities

