

City of San Leandro

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San Leandro, California 94577

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October 17, 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 San Leandro 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 and availability of fleet charging infrastructure are 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; and
- for CARB to acknowledge that many cities will require backbone infrastructure upgrades to support municipal fleet conversions, and to provide financial assistance to local governments for these upgrades.

More detail regarding our recommendations is provided below.

Lack of Commercially Available Heavy and Medium Duty Vehicles

Many of the heavy and medium duty vehicles covered by the ACF regulations such as street sweepers are not commercially available as ZEVs, making it impossible for fleet operators to comply. This reality should be recognized by CARB and the ACF regulations revised to ensure that fleet conversion is not required until the vehicles in question are commercially 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.

Backbone Infrastructure Needs for Municipal Fleet Conversions

San Leandro is supportive of CARB's goal of shifting to ZEVs in municipal fleets and has been a leader in the Bay Area and nationally in municipal fleet conversions. We recently completed a preliminary assessment of our municipal fleet conversion through East Bay Community Energy.

Despite our desire to accelerate conversion of our municipal fleet, additional electrical load at existing buildings where significant numbers of fleet vehicles are parked can't be accommodated without expensive upgrades to backbone electrical infrastructure. City staff is currently preparing detailed cost estimates but anticipates that required infrastructure upgrade costs at the city hall building alone will be several million dollars. Staff has explored grant funding from multiple sources for the necessary upgrades, but most granting organizations require that any EV charging infrastructure be publicly accessible, which is a non-starter for secure facilities like police buildings. As a practical matter, cities will need funding assistance for infrastructure and even then, long lead times associated with utility upgrades will make meeting the fleet conversion timelines laid out in the ACF regulatory language a challenge.

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

Sincerely,



Mayor Pauline Russo Cutter
City of San Leandro

cc:

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

Pauline Russo Cutter, Mayor

City Council:

Victor Aguilar, Jr.

Deborah Cox

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