

October 25, 2022

Comment Letter Submitted via Electronic Commenting System

To: Mr. Tony Brasil, Mr. Craig Duehring, Mr. Paul Arneja
Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

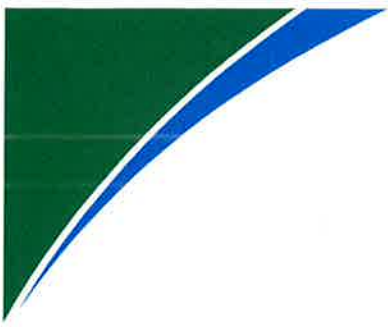
Re: Proposed Advanced Clean Fleets Regulation Public Fleet Requirements

Placer County Department of Public Works appreciates the opportunity to provide public comment on the Advanced Clean Fleets Regulation – Public Fleet Requirements. Placer County operates 154 vehicles that would be covered by the proposed fleet requirements. Placer County maintains approximately 1,100 miles of roadway, 300 miles of sewer line, and 46 sewer lift stations, 5 water wells and 5 landfills. We operate 2 major corporation yards and 7 additional road maintenance yards where a variety of vehicles are housed.

Placer County spans from the Sacramento County line to the Nevada State line and requires many of our vehicles to drive over 100 miles per day, often towing or hauling other equipment. Much of the battery range on an electric vehicle will be drawn down due to slope, accessory equipment and use of the heater and air conditioning units. Because of snow and terrain, 52 of our fleet are 4x4 ¾ ton pickups which also require more fuel than a standard vehicle.

We are requesting CARB to consider the following requests:

- 1) Provide additional time for implementation. The regulation as proposed requires public fleets to begin conversion in 2024 with 50% of added vehicles being zero emission and 100% by 2027. We are also working toward implementing the Innovative Clean Transit Regulation of 2018 which requires conversion to zero emission to begin in 2026 and be complete by 2040. To be consistent with our timeframe for implementing zero emission buses, it would be more manageable and potentially achievable to move the start year to 2026 with 15% of commercially available vehicles converted to zero emission. A slower phase in through 2040 is also requested and will allow the County to better consider the location of charging facilities to match the location of future corporation yards.
- 2) Define "Commercially Available" in the Draft ACF prior to requiring fleets to make future purchases of new medium- and heavy-duty vehicles starting as early as 2024. As it pertains to the Draft ACF purchase requirements, include the following considerations:



- Available in sufficient supply to be purchased and received in acceptable time-frame comparable to available internal combustion emission vehicle (ICEV).
- Available in sufficient quantities to provide for a competitive bidding environment and avoid price manipulation by vehicle manufacturers and dealers.
- Available from multiple reputable vehicle manufacturers as a certified zero-emission powertrain.
- Meets required specifications (e.g. duty cycle duration, elevation, climate, emergency response conditions, off-road capabilities) and exists in practice.
- Sold for no more than 33% over retail price for ICEVs of the same vehicle configuration.

3) In Section 2013(d) please clarify that to “add” fleet means to place a final order for fleet.

We appreciate the opportunity to comment on this very important rulemaking to provide input for our essential fleet operations. We look forward to earnest conversations with CARB staff as the Advanced Clean Fleets Regulation is finalized.

Sincerely,

Ken Grehm,
Director of Public Works

cc: Jane Christensen, Acting Placer County Executive Officer