

October 27, 2022

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

RE: COMMENTS ON THE DRAFT ADVANCED CLEAN FLEETS REGULATORY LANGUAGE

Dear Mr. Segall:

On behalf of the City of Sacramento (City), I write to provide comments on the Draft Advanced Clean Fleets (ACF) proposal. The City is committed to creating a zero-emission fleet for all vehicles and equipment that are purchased for city use. We strongly support California zero-emission future and are consistently leading by example with our zero-emissions and alternative-fuel fleet. Sacramento is recognized as one of the top green fleets in North America, and we currently have over 100 light-duty ZEVs in the City fleet. We are eager to serve as active partners achieving the State's ZEV goals, and we believe that local public fleets have an important role to play. To ensure the success of the proposed ACF rule, we urge the Board to direct revisions to the ACF to better address the unique limitations of local agencies providing critical services.

Specifically, we urge the Board to consider market readiness of technology, and limitations of local funding for public infrastructure when establishing implementation timelines and consider additional funding for local governments subject to these new guidelines.

- The proposed regulations should have modified timelines or penalties excluded to provide manufacturers with the time needed to advance technologies and test vehicles in the zero-emission field. The City understands and agrees with the intent of the regulations and urgency of the matter at hand. However, the implementation timeline is concerning. The existing medium and heavy-vehicle market conditions are not conducive to purchasing the required vehicles within the timeframe provided. CARB should delay the effective date of the regulation or maintain flexibility in the timeframe in which the vehicles must be procured.

Market readiness should include consideration of the operational requirements, and predictable purchasing timelines needed to maintain public services.

- The exemption for construction delays should be expanded to accommodate the range of charging infrastructure challenges that local agencies face.
 - Funding for charging infrastructure is posing one of the biggest concerns for the City. There is limited funding for the installation of charging infrastructure to cover the next five years of electric vehicle purchases – primarily through federal and state grants. Most grant opportunities do not cover fleet chargers, which is the majority of the chargers planned for City installation over the next few years.
 - Behind-the-gate infrastructure is critical to ensure that charging is available when needed to support the delivery of critical public services and ensure efficiency of public staff time. The traditional budgeting process will not cover the high upfront costs of installation of this infrastructure, and despite massive infrastructure commitments from the State and Federal government, the needs of local fleets with constrained budgets continue to be deprioritized. Unfortunately, with the increased costs of vehicles and installing infrastructure, local municipalities will be forced to increase rates and taxes to cover the additional funding needed.

Thank you for the opportunity to provide comments and feedback on the proposed Advanced Clean Fleet regulations. Should you have any questions about our feedback, please contact Consuelo Hernandez, Director of Governmental Affairs, at 916-808-7395 or cahernandez@cityofsacramento.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jay Schenirer', with a stylized flourish at the end.

Jay Schenirer
Chair, Law and Legislation Committee