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

**RE: County of Del Norte Comments on the Draft ACF Public Fleets Regulatory Language**

The Public Works Department of the County of Del Norte appreciates the opportunity to provide comments on the Advanced Clean Fleets (ACF) draft regulatory language (March 23 iteration) for public fleets as proposed by the California Air Resources Board's (CARB) staff. There are several items that we are seeking clarity on. We also have serious concerns with the aggressive timelines, which due to local budget cycles, are simply unattainable.

We are grateful for the collaborative workshops held by CARB to discuss general concerns and for providing feedback on some of the suggestions. While the latest iteration reflects some of the exemptions and extensions that were requested, we remain concerned with the following:

**Limited Options:** We recommend that CARB consider exemptions for vehicles based on a maximum percentage price as compared to traditional vehicles. Local governments strive to be good stewards of the taxpayer's dollars, but without a percentage price exemption, the proposed regulations may result in zero-emission vehicles (ZEV) that are put to market at an artificially inflated rate. A percentage price cap would potentially prevent manufacturers from manipulating the market and help local governments protect taxpayer resources. An exemption should apply if the ZEV price exceeds 5% of the cost of a similar traditional vehicle.

**Inventories.** We believe that CARB should provide a list of available manufacturers that have market-ready vehicles in the medium- to heavy-duty class sizes, 2B- 8. Availability of model/body types of multiple weight classes (and functions) are not confirmed by fleets, but rather by manufacturers informing CARB that models will be available.

**Timelines and Public Funding.** The proposed regulations continue to impose aggressive timelines for compliance. They do not consider public budgets and funding methods for capital projects. Counties have limited budgetary resources that cannot be easily repurposed at the scale this proposed regulation would require. Requiring compliance to start on Jan. 1, 2024, would require significant and immediate investment from local budgets for the preconstruction that is simply unattainable. Electrifying service yards to support an electrified fleet is a much greater undertaking than a simple electricity panel upgrade or some quick trenching in the parking lot. The time and costs for planning, engineering, and expansion of both the electrical capacity of a facility's system and the distribution system that feeds it are well beyond the available budget of counties. While savings may eventually manifest from retiring or repurposing internal combustible engine assets, they will have no effect on the upfront expenses. For these reasons, we believe that local governments need an extension of at least ten years from regulation adoption.

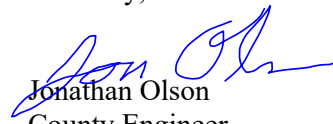
**Exemptions for Small Counties.** The proposed regulations make no consideration for small, rural, or economically disadvantaged communities. Small Counties are disproportionately affected by regulations that impose additional costs on local governments but fail to fund those expenses. We request that counties under 50,000 in population be fully exempted from this rule. We request that if exemptions are not allowed that small and or disadvantaged counties be granted an extension of at least ten years from regulation adoption.

The proposed regulations ignore existing market realities, as well as the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles. If required to comply with the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments.

Counties across the state are pursuing robust, environmentally sound strategies to decarbonize their communities. However, this proposed regulatory language does not account for rising utility costs and substantial mandates from multiple regulatory bodies. We urge CARB to consider these impacts to ensure this regulation succeeds without further exacerbating the affordability issues facing many of our counties and residents.

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

Sincerely,

  
Jonathan Olson  
County Engineer  
County of Del Norte

cc: California State Association of Counties via email: [kgallagher@counties.org](mailto:kgallagher@counties.org)