



DEPARTMENT OF PUBLIC WORKS  
**COUNTY OF HUMBOLDT**  
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April 6, 2023

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

RE: County of Humboldt Comments on the Draft ACF Public Fleets Regulatory Language

The County of Humboldt 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 our concerns and for providing feedback on some of our suggestions. While the latest iteration reflects some of the exemptions and extensions that we requested, we remain concerned with the following:

**Lack of Price Caps.** We recommend that CARB consider imposing price caps to ensure the market responds positively with vehicles at competitive rates. Local governments strive to be good stewards of the taxpayer's dollars, but without price caps, the proposed regulations may result in zero-emission vehicles 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.

**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 will 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 (10) 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.

The County of Humboldt has begun the replacement of trucks with newer technology in our heavy equipment fleet which consists of on-road vehicles as well as off-road vehicles. Funding is an issue to this process, but we are currently phasing out retro fits and after this year I may need to shut down 6 trucks due to lack of funding which will be a major hindrance to our Public Works Roads Division which depend on these vehicles to complete jobs in our rural, mountain type terrain County. Currently the ZEV's on the market do not meet the needs of the County due to the lack of mileage available and our terrain really damages the ZEV's mileage allotment due to the hills and mountains terrain we work as well the price point is almost double the cost of a combustion engine vehicle. Due to this we are purchasing the most emission-friendly units available on the market and have switched to automatic transmissions to reduce our carbon footprint. The automatic transmissions have taken the over revving and unnecessary throttling which in turn is using less fuel and less emissions are put out because of this. Due to not having any infrastructure in place in our rural county we have begun to look at different options on types of vehicles and since there is not an equivalent to combustibles, we are looking at all options such as hydrogen over electric, but the technology is not there for us to purchase a vehicle with this type of fuel now and according to the manufacturers not in our near future.

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

Sincerely,

Aaron Lagasse  
Equipment Superintendent  
County of Humboldt

A handwritten signature in black ink, appearing to be 'A. Lagasse', with a long horizontal stroke extending to the right.

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