



"Citrus Capital of the World"

City of Santa Paula

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October 25, 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 Santa Paula 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 is 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.

The proposed regulations ignore existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles.

For example, existing zero-emission technology limits a garbage truck's range to 100 miles or less, with a payload loss of 6,000 to 7,000 pounds. This reduction in payload capacity, combined with the time needed to charge a truck, means that agencies would need two garbage trucks for each one in service, significantly increasing costs for both vehicle infrastructure and labor.

Many of these vehicles are not commercially available. If a city has planned for supporting infrastructure and budgeted for such purchases, it should be recognized by CARB and receive an extension for compliance instead of being penalized for vehicles not yet 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.



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If required to follow the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. Cities across the state are pursuing environmentally sound and robust strategies to decarbonize their communities. However, this proposed regulatory language does not account for rising utility costs, and substantial mandates from multiple regulatory bodies, so we urge CARB to consider these impacts to ensure success for communities without further exacerbating the affordability issues facing many of our cities and residents.

The City of Santa Paula recently signed a 25-year contract with Athens Services which will include a new fleet of vehicles powered by Compressed Natural Gas. These vehicles will contain the cleanest available heavy-duty engines in the world – 90% cleaner than the U.S. Environmental Protection Agency's strictest emissions standard. Near-zero emission natural gas engines are certified to a NOx standard that is 90% cleaner than diesel engines and reduce both particulate matter emissions and greenhouse gas emissions. Athens now fuels 100% of their natural gas collection fleet with carbon negative RNG.

The proposed regulation will have a significant impact on Santa Paula due to lack of electrical infrastructure. Current and future electricity supply issues highlight long-term concerns about reliability and affordability associated with the Draft ACF. Beyond these system-level challenges, fleets may need to work with local utilities and other partners to install vehicle chargers. These projects can suffer their own delays when there is a lack of local distribution capacity.

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

Sincerely,

Dan Singer
City Manager

cc: Clete Saunier, Public Works Director
League of California Cities (via email: cityletters@calcities.org)