



County Administrative Office
Governmental & Legislative Affairs

Bradley A. Jensen
Director

October 24, 2022

Liane M. Randolph, Chair
California Air Resources Board
1011 I Street
Sacramento, CA 95814

Re: Item 22-14-1: Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph and Members of the Board,

On behalf of the San Bernardino County Board of Supervisors, I wish to share our serious concerns over the proposed Advanced Clean Fleets regulations that will impose stringent requirements on new vehicle purchases for local government fleets.

The proposed Advanced Clean Fleets rules will require that 50 percent of new local government fleet vehicles purchases be zero-emission starting January 1st, 2024. By January 1st, 2027, all new fleet vehicles purchased must be zero-emission with some limited exceptions. These new state regulations will harm the day-to-day operations of local government fleets across California by raising the cost and lowering the reliability of new vehicles. Transitioning to widespread use of zero-emission vehicles (ZEV) will also require major capital outlays to build the supporting infrastructure necessary to charge, refuel, and maintain these vehicles. These costs would be especially heavy for county governments that must maintain infrastructure and provide public safety in remote areas over great distances. While we understand the Air Resources Board's desire to decrease greenhouse gas emissions from the transportation sector, zero-emission vehicles are currently unable to sustain the heavy-duty uses of local government fleets.

Significant Investment Required to Install Infrastructure that Supports Zero-Emission Vehicles

San Bernardino County is the largest county in the country covering over 20,000 square miles. Like many parts of California, San Bernardino has an extraordinary geography with tall mountains, dense forests, vast deserts, and a heavily populated urban core. Our County has a superbly well-managed fleet of over 7,000 vehicles that are used for a wide variety of tasks and purposes. Our Fleet Management Department typically buys 300 new vehicles every year.

The County has extensive experience with many alternative fuel and zero-emission vehicles. Natural gas engines have been successfully used in many different fleets across California, especially for bus providers. While our County has many natural gas vehicles, they have a short range and can only operate in limited areas where natural gas refueling is available. They are unable to operate in our mountain communities since there is no infrastructure or mass delivery system to refuel those vehicles.

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Electric vehicles are also challenging to operate in our County where our vehicles must drive hundreds of miles round trip. Many electric vehicles have a limited range before a charge is required. In remote communities such as Needles, Trona, and Baker, electric charging stations either do not exist or are very few. If these regulations are adopted, the County would have to build extensive charging infrastructure in extremely isolated areas. Charging would also significantly affect County operations, as employees would need to often stay overnight in areas where accommodations are minimal to charge their cars or trucks. This would not only be costly but would displace our fleet management personnel for extended periods of time: A routine maintenance trip that could be done in half a day would now take two days under these new regulations.

Limited Supply and Availability of Zero-Emission Vehicles

The disruption of global manufacturing supply chains is magnified for zero-emission vehicles. With the high demand for a limited supply of these vehicles, new purchases can go undelivered for months, even years. These delays require fleet managers to rely on the remaining vehicles in their fleet to make up for the gap of undelivered new vehicles, increasing the wear and tear on vehicles and driving up maintenance costs.

One of our major concerns is the short time between the 2024 and 2027 new vehicle purchase requirements. If half the new purchases must be ZEVs starting in 2024, and there are inevitable delays in their delivery, local government fleets will have bought vehicles in high numbers that are unavailable for service. This will only grow larger as all new purchases must be ZEVs starting in 2027. The result is likely to be the overuse and higher cost to maintain diesel and gas combustion vehicles, which are readily available, easier to support and repair, and above all, reliable.

Exemption of Local Government from the Advanced Clean Fleets Regulations

Government vehicle fleets must perform a wide variety of complicated tasks. While the state may promote the use of new technologies that will reduce vehicle emissions, this must be weighed against the urgent needs of the public for reliable service delivery by local governments. Vehicle fleets are essential to that mission, from fighting fires, patrolling our streets, repairing flood control channels, and providing emergency medical assistance. By adopting these Advanced Clean Fleets regulations, California is increasing the costs for residents and making the delivery of these essential services harder. We strongly encourage the Air Resources Board to exempt local governments from this set of regulations and explore ways to better support the transition to zero-emission vehicles in the future.

If you have any questions about our comments, please contact us Brad Jensen, Director of Legislative Affairs, at bradley.jensen@cao.sbcounty.gov. He can explain our position in detail and direct any inquiries to the appropriate members of our staff.

Sincerely,



Curt Hagman
Fourth District Supervisor
Chairman, San Bernardino County Board of Supervisors