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

**RE: County of Ventura General Services Agency Comments  
on the Draft ACF Public Fleets Regulatory Language**

Thank you for the opportunity for feedback and the workshops conducted regarding this draft regulation. The County of Ventura General Services Agency, a public fleet entity, would like to respond to the proposed modified text of the Advanced Clean Fleet (ACF) regulation. We are looking for clarity on some items and have serious reservations on others. Given limits on funding for public fleets, we are especially concerned about the compliance requirements and continue to have reservations about the following:

**1) Considerations for Demand/Cost Increases**

We suggest that CARB implement yearly price increase limits on vehicles as well as extend a waiver for demand charges for electric vehicle (EV) infrastructure meters. This would be to help stabilize budgets for fleets that need to comply with ACF as well as assisting to keep pricing steady ahead of significantly increased demand due to the ACF implementation. As a public entity we want to protect the tax dollars of our county and the public from volatile budget fluctuations. The conjunction of this ACF program along with utilities starting to reapply demand charges for EV meters next year will exacerbate costs.

**2) Lack of Available Vehicle Information**

We suggest that CARB should compile and maintain a listing of available class 2B-8 vehicles along with their manufacturers and relevant vehicle information. This would help fleets access up to date information and position budgets for continued compliance. Manufacturers can provide timelines of upcoming Zero Emission Vehicles (ZEVs) or Near Zero Emission Vehicles (NZEVs) entering the market.

**3) Aggressive ACF Timelines**

The latest proposed ACF changes still require compliance starting January 1, 2024, which is an aggressively demanding schedule. Our agency needs to navigate complicated budgeting as required by the State. As an Internal Service Fund, our funding is provided through service rates billed to other agencies. Those funds are not discretionary nor usable for any other needs. With this, we need to give our customer agencies ample warning of changes in budget. Because we have leased properties, we will not be able to install infrastructure everywhere it is required due to existing lease contracts. Our facilities are not collocated, and it can take hours to travel

between them, necessitating additional investment as compared to organizations with centralized footprints. Finally, preconstruction efforts could shutter projects due to lack of available capacity or the extreme waitlists of Electric Vehicle Supply Equipment (EVSE) and alternative fuel vehicles. All of this summarizes the need for more than a two-year delay in the ACF regulation.

#### **4) Available Funding**

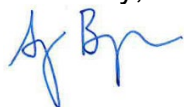
Each vehicle replacement requires a large public expenditure. EVs cost between 100% to 200% more for similar heavy equipment, and the infrastructure required costs a minimum of \$20,000 per charging port. Additionally, the transition requires significant efforts and budgets between engineering, logistics, and finance. There will eventually be reduced costs from maintenance and fuel, but most of the program cost will be a large expense at initial procurement for which the timeline allows little preparation. And finally, as the State itself struggles with budget shortfalls, these historically are allocated down to the county level. Available funding to pursue anything short of current program maintenance can be complicated in such a scenario. State funded incentive or grant programs can also be discontinued due to a lack of funding. These situations would severely limit the county's available funding for any other projects, to include clean air transition projects. For these reasons, we believe that local government fleets need additional funding opportunities for non-public accessible fueling.

We are one of 58 counties in this state working to reduce emissions for our public in a measured, responsible manner. In this, we ask that you consider our recommendations and the consequences to budgets across the state if ignored, in addition to potential higher costs to the public that we serve.

The County of Ventura General Services Agency Fleet started its decarbonization journey in the early 2000s with a Hybrid Vehicle Policy. Through this year it has brought our fleet up to 54 hybrid vehicles currently in service. We then transitioned from standard to renewable diesel in 2016, reducing greenhouse gas (GHG) emissions of our diesel vehicles by 80%. Our first EVs were purchased in 2013, expanding to a current fleet of 11 plugin hybrid electric vehicles (PHEVs) and 32 EVs. We have another 69 clean air vehicle transitions coming in 2023 to include 26 additional EVs along with 43 more PHEVs. Our current strategy is to identify areas of opportunity based on market available ZEVs or PHEVs that meet our agencies' duty cycle requirements. We use this information for minimal negative impact against county budgets prior to presenting replacements for approval by our Board of Supervisors. The proposed change can significantly affect the County of Ventura's budget without options to set price caps or additional avenues of funding for non-public accessible fueling.

Once again, we appreciate the opportunity to give feedback to the draft regulation of ACF for your review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Bergman'.

Greg Bergman, CPA  
Administrative Services Director  
General Services Agency, County of Ventura