



Mayor Karen K. Goh
City of Bakersfield

April 7, 2023

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

RE: City of Bakersfield Draft ACF Public Fleets Regulatory Language

The City of Bakersfield appreciates the opportunity to comment on the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) draft regulatory language (March 23 iteration). The city seeks clarity on several items. We also have serious concerns about 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 which 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. Many local governments follow a two-year budget cycle, and many cities have a five-year capital budget cycle 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 cities. 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 four 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.

In Bakersfield there are approximately 384 vehicles that could be affected by this regulation. To transition from our current infrastructure (LNG and CNG) to electric or hydrogen would take considerable planning and funding. The City has spoken with vendors who have indicated that the phase 3 version of refuse trucks will not be out to market until later this year and is estimated to be limited to a restrictive 1,100 stops and 100 miles. Until we can test these vehicles ourselves, we cannot be certain they will meet our current needs without major changes to programs or staffing.

This proposed regulatory language fails to account for rising utility costs, substantial mandates from multiple regulatory bodies, market realities, budget deficits, and affordability issues facing our residents.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Karen K. Goh". The signature is fluid and cursive, with a large initial "K" and "G".

Karen K. Goh
Mayor, City of Bakersfield