

September 11, 2025

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: **Comments on the ACF Amendments Implementing AB 1594 (2023) Regulatory Changes**

Dear Chair Randolph,

The City of Fortuna appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleets (ACF) regulatory language in response to the passage of Assembly Bill 1594 (2023 Statutes, Chapter 585).

Earlier this year, we have seen major structural changes to all aspects of the Zero Emission Vehicle manufacturing, sales, availability and the development of refueling infrastructure to support these vehicles that have created significant challenges for local agencies. Highlighting the impact on small municipalities like ours, particularly considering the need to expand both electrical capacity and distribution systems to support zero-emission fleets. While we are fully committed to California's climate goals, we must emphasize that the timeframes and costs associated with the required infrastructure expansions present significant challenges for local governments with limited resources.

Our town is actively working to transition our municipal fleet to zero-emission vehicles in compliance with ACF, but we face major financial and logistical barriers in doing so. Not only do we need to invest in upgrading the electrical capacity of our facilities, but we also need to upgrade and expand the distribution infrastructure that delivers power to these charging stations. These upgrades—spanning from electrical grid capacity to localized distribution networks—are both time-intensive and costly, and they far exceed the available budgets of smaller municipalities.

Specifically, the planning, engineering, and construction of the necessary electrical and distribution systems require substantial upfront investment and a timeline that stretches well beyond the current ACF deadlines. In many cases, this work requires coordination with utilities, which adds additional complexity and delays. These

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challenges are particularly acute for small cities and rural areas that lack the resources and economies of scale to manage such large infrastructure projects.

In light of these concerns, I urge the California Air Resources Board to consider the following amendments to the ACF regulations:

1. **Provide extended timelines** for municipalities and fleet operators in small or underserved areas that are working to build out the necessary infrastructure to support zero-emission vehicles. A more flexible approach to deadlines would allow these communities to invest in long-term infrastructure solutions without overburdening local budgets.
2. **Allocate dedicated funding and financial incentives** for the planning, engineering, and expansion of both electrical capacity at charging facilities and the distribution networks that feed them. These upgrades represent a significant and ongoing cost to municipalities, and without targeted financial support, many small communities will be unable to keep pace with regulatory requirements.
3. **Support infrastructure development coordination** between local governments, utilities, and CARB. Given the scale and complexity of these infrastructure projects, a streamlined process for permitting, funding, and technical assistance would help local municipalities more effectively meet the demands of the ACF regulation.
4. **Allow phased compliance requirements** for municipalities that are actively working on infrastructure but face delays in engineering and construction timelines. These phased requirements would help ensure that we're not penalized for challenges that are beyond our control but are still committed to transitioning our fleets to zero-emission vehicles.

The expansion of electrical capacity and distribution infrastructure is a critical bottleneck in the transition to zero-emission fleets, and the financial strain of these necessary upgrades is a real concern for communities like ours. By considering these adjustments, CARB can help ensure that small towns and local governments can meet California's climate goals without putting undue strain on our resources or jeopardizing the progress we're already making.

The City of Fortuna fully supports California's climate goals, and we need thoughtful policy coordination to make sure these goals are practical and achievable for communities of all sizes. With more aligned planning and support, we can help ensure

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that AB 1594 implementation is successful without compromising the process or intent of the ACF regulation. We appreciate you considering the real-world impacts these rules have on cities like ours.

Sincerely,



Mike Johnson, Mayor  
City of Fortuna

cc:

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