

## Nevada County (Josh Hylinski)

Nevada County recognizes the intent of CARBs Advanced Clean Fleets Rule (ACF) to reduce emissions and transition fleets toward cleaner technologies with reduced emissions. However, compliance presents significant operational and financial hardships for our county, particularly for medium and heavy-duty public works vehicles.

While the ACF rule provides exemptions for emergency vehicles equipped with lights and sirens, low use equipment, and certain permanent snow removal equipment, it does not extend similar consideration to many public works vehicles. In practice, these vehicles often serve critical emergency functions. They are routinely deployed for snow removal, wildfire evacuation response, roads closures, storm damage, and wastewater operations. From an operational standpoint, they function as emergency response assets, even if they do not meet the exemption criteria.

A key concern is the ACF requirement that all new vehicle purchases over 8,500 pounds and above be zero-emission starting in 2029. At present, there are no widely available, proven zero-emission options for Class 2b and above trucks that can meet the demands of Nevada County's terrain, climate, and duty cycles. Existing electric vehicle options have limited range and require extended charging times, which are not compatible with continuous operations such as 24-hour snow removal shifts, and vehicles being staged off site.

Geography further compounds these challenges. Our crews must travel significant distances often into remote and mountainous areas such as the town of Washington, North San Juan, Hobart Mills, Soda Springs, and Cascade Shores, before work even begins. This results in substantial energy consumption simply reaching job sites, reducing operational effectiveness for battery-electric vehicles.

Additionally, many of the currently available zero-emission heavy-duty vehicles are produced by newer or startup manufacturers. These companies often lack established service networks, parts availability, and warranty support in our region. This creates unacceptable risks for maintaining critical fleet readiness.

Cost is another major barrier. Electric heavy-duty vehicles can cost nearly twice as much as their internal combustion counterparts. While the ACF rule allows for backup vehicles, maintaining duplicate fleets to ensure operational reliability during emergencies would significantly increase both capital and ongoing maintenance costs, placing an unsustainable burden on our rural county and the taxpayer.

Nevada County currently lacks the infrastructure needed to support widespread deployment of zero-emission heavy-duty vehicles. Charging infrastructure is limited, and hydrogen fueling infrastructure is nonexistent. Until these systems are developed, large-scale adoption is not feasible.

While we support the transition to cleaner technologies, particularly for light-duty vehicles, the current requirements for 8500lb and above vehicles are not yet practical for our operations. A more flexible approach, including consideration of hybrid technologies or alternative fuels, would better support both environmental goals and the critical services we provide to the public.

Finally, successful implementation of the CARB Advanced Clean Fleets Rule depends on the availability of reliable, cost effective, and operationally functional vehicles. OEM manufacturer readiness is critical to ensure that fleets are not required to adopt technologies that do not yet meet the performance, serviceability, and lifecycle cost needs of Nevada County.