

Santa Cruz County - Department of Community Development and Infrastructure (Carolyn Burke)

Please see attached comment letter from the Santa Cruz County Department of Community Development and Infrastructure.



County of Santa Cruz

Department of Community Development and Infrastructure

701 Ocean Street, Fourth Floor, Santa Cruz, CA 95060
Planning (831) 454-2580 Public Works (831) 454-2160
<https://cdi.santacruzcountyca.gov/>

Matt Machado - Deputy CEO / Director

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4/17/2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA. 95814

Re: Advanced Clean Fleets 15-Day Comment Period Response

Chair Lauren Sanchez and the Members of the California Air Resources Board:

We greatly appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While the goals of these regulations are laudable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

Our department serves a geographically expansive and environmentally complex region encompassing approximately 445 square miles, maintaining over 600 miles of roadway and supporting associated drainage conveyance infrastructure. In addition, our Special Services fleet supports critical sewer infrastructure and solid waste operations, together forming the backbone of essential public health and safety services for Santa Cruz County residents. Much of our service area consists of rural, heavily forested communities accessed primarily by narrow, winding mountain roads. These areas are particularly vulnerable to winter storm damage, wildfires, and seismic events, requiring reliable, immediate, and sustained emergency response capabilities. Similarly, our sewer and solid waste systems must remain operational during and after such events to protect public health. The Santa Cruz County Sanitation District alone maintains approximately 200 miles of sanitary sewer pipeline, 4,780 manholes, and 35 pump stations, serving a population of over 72,000 residents through roughly 36,000 connections.

The terrain and operational demands within this environment present significant challenges to the implementation of battery-electric vehicles (BEVs) under the Advanced Clean Fleets (ACF) regulation. Steep grades and extended travel distances substantially reduce the already limited operational range of currently available heavy-duty electric trucks. During emergency events, our department operates continuously, often around the clock, placing sustained, high demand on our fleet. To maintain the same level of service with existing BEV technology, multiple



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replacement vehicles would likely be required for each conventional unit, which is both operationally and financially impractical.

These limitations have been observed in practice. Attempts to incorporate electric vehicles into heavy-duty operations have demonstrated that they are significantly underpowered to perform required tasks even under normal operating conditions. During disaster scenarios such as severe storms or earthquakes extended power outages are common, which would render an electric fleet inoperable at precisely the time when dependable vehicles are most critical to maintaining roadway access, sewer functionality, and sanitary conditions.

Compounding these challenges is the absence of charging infrastructure within the mountainous portions of our service area. The installation of sufficient electric vehicle supply equipment (EVSE) in these remote locations is not currently feasible due to logistical, electrical capacity, and financial constraints. Preliminary cost estimates for even modest EVSE deployment at our Roads and Sanitation facilities exceed \$5,500,000. As a result, vehicles would need to travel considerable distances out of service to access charging facilities, further reducing response capacity, increasing downtime, and limiting our ability to keep critical routes open for emergency responders, medical services, and evacuation.

In addition to roadway and sewer operations, our department manages solid waste services, including transfer operations that are essential to maintaining sanitary conditions across our communities. We operate two solid waste facilities utilizing Class 8 tractors pulling walking floor trailers powered by PTO-driven hydraulic systems. Each transfer route consists of an approximately 85-mile round trip between transfer stations and landfill sites, with each cycle requiring approximately 30 minutes of high-flow hydraulic operation to discharge loads. Currently, each transfer truck completes two to three trips per day.

Under existing BEV limitations, a single electric tractor would not have sufficient range to complete even one full round trip, including PTO operation, without requiring recharging. To maintain current service levels, we estimate that up to three BEV tractors would be required to replace a single diesel unit. These challenges are further exacerbated by strict operating hour limitations at both transfer and landfill facilities, leaving no available time for vehicles to detour for charging, swap equipment, and return to service without disrupting operations.

Within the next 5–7 years, Santa Cruz County will close its only local landfill and transition to transporting solid waste to regional facilities outside the jurisdiction. This change will further increase haul distances and operational demands on transfer trucks, intensifying the limitations already observed with current electric vehicle technology.



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Consequently, transitioning these critical fleet operations to electric vehicles would require a substantial increase in vehicle procurement (potentially two to three times the number of units at approximately double the cost per vehicle) along with a corresponding increase in staffing levels to sustain operations. This represents an unsustainable escalation in both capital and operational expenditures for our department.

Ultimately, these constraints directly impact our ability to deliver essential services. Roadway maintenance, sewer system operation, and refuse disposal are critical missions that cannot be compromised. Any disruption in these services would have immediate and adverse consequences for public safety, emergency response, and the overall health and wellbeing of the communities we serve.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the October 7th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing our state's 5,000 local agencies and 40 million residents.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating unnecessary challenges in complying while maintaining the many critical services Californians rely upon for their most essential daily needs as well as during emergencies and disasters.

Vehicles that that need to be categorically exempted from the regulations the same manner as those found in **part (c) of § 2013 of title 13 of the California code of regulations** to include those vehicles that respond to, assist in and recover from disasters and emergencies to include: **Flood control and stormwater infrastructure maintenance and response vehicles, sewer and wastewater utility vehicles, solid waste collection and support vehicles, and roadway maintenance and emergency response vehicles.**

These vehicle classes perform critical public safety functions and must remain operational under all conditions, including extended duration emergencies where zero-emission vehicle limitations, such as range constraints, charging availability, and refueling time, would significantly impair response capability, delay service restoration, and increase risks to public health and safety.



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We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most.

Thank you for your consideration,

MATT MACHADO
Deputy CEO
Director of Community Development
& Infrastructure

By:

DocuSigned by:
Carolyn Burke
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Carolyn Burke
Assistant Director
Special Services