



April 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standards Regulations

Dear Members of the Board:

The City of Oakland respectfully opposes the California Air Resources Board's (CARB) proposed amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standards Regulations. The proposed amendments would change existing fleet requirements in the California Code of Regulations (CCR) that would negatively impact local governments and citizens.

Expanded applicability of ACF requirements

By redefining "waste fleets" to include city contractors, the proposed amendments would require local governments to police compliance of private companies' vehicles operating under municipal agreements. This change effectively converts municipal procurement and service delivery into a tool of state enforcement by requiring cities to mandate service providers meet state established mandates. This adds additional financial burden for Oakland's rate payers and labor burden for City staff.

Impact on critical operations

Due to limited vehicle options on the market, concerns over increased maintenance burden, and less functionality and adaptability in many circumstances, the City of Oakland is concerned that this requirement may hinder our ability to respond to emergencies, including the management of disaster debris which becomes a public health and environmental crisis if not addressed quickly and efficiently.

Unfunded mandates

The proposed amendments impose new legal and administrative burdens on local jurisdictions by requiring monitoring of contractor compliance and contract disclosures, as well as additional recordkeeping with little time to respond to state audit requests. These requirements turn routine contracting into enforcement, requiring annual validation of contractors, multi-year auditable documentation, and short timeframe response to CARB's requests. As a result, these proposed amendments impose unfunded mandates, increase administrative costs, and add additional risk to procurement. It may also limit competition among vendors, potentially shutting out small and minority owned businesses which may be less likely to adapt to these new requirements.



The proposed amendments to the ACF regulation do not adequately account for operational realities of local government fleets, including being able to quickly and adequately respond to emergencies.

We respectfully urge CARB to reject these newly proposed mandates on cities, and instead establish clear, categorical exemptions, consistent with those in Section 2013(c) of Title 13 of the CCR.

Sincerely,



Liam Garland (Apr 17, 2026 16:20:12 PDT)

Liam Garland
Director, Public Works

Cc: Barbara Lee, Mayor
Miya Saika Chen, Chief of Staff, Mayor's Office
Jestin Johnson, City Administrator
Besty Lake, Assistant City Administrator
Kristin Hathaway, Assistant Director, Public Works
Brittney Jenkins, Manager, Environmental Services Division
Rebecca Parnes, Manager, Recycling Program








City of Oakland Comments to CARB

Final Audit Report

2026-04-17

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