



April 17, 2026

The Honorable Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Advanced Clean Fleets 15-Day Comment Period Response

Dear Chair Lauren Sanchez and Members of the California Air Resources Board,

The City of Santa Clara appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity for us to comment on the proposed modifications.

Cities across the state are pursuing robust, environmentally sound strategies to decarbonize their communities. However, cities must also ensure the uninterrupted delivery of critical public services. As currently structured, the proposed modifications do not adequately account for the operational realities of local government fleets, particularly those that support emergency response and essential infrastructure.

Cities serve diverse and often expansive communities, providing vital services that protect public health, safety, and welfare. During emergencies, fleet vehicles must operate continuously for extended periods, often in extreme conditions, to support fire prevention and response, search and rescue, medical response, and the delivery and maintenance of essential utilities such as water, wastewater, and stormwater. Without appropriate and durable exemptions, ACF strict requirements risk constraining cities' ability to respond effectively to disasters, maintain critical infrastructure, and safeguard the communities we serve.

The proposed amendments to the ACF regulations significantly expand the scope of local government responsibility by extending compliance obligations beyond publicly owned fleets to include private contractors operating under municipal agreements. Cities are indirectly responsible for ensuring that contracted operations meet state mandates. This shift effectively converts municipal procurement and service delivery into a vehicle for state enforcement, exposing cities to increased costs, reduced contractor availability, and diminished flexibility in negotiating long-term service agreements, particularly for essential services like construction, maintenance and all aspects of public works. Some of these additional costs will transfer down to residents through increased rates.

In addition, the proposal imposes substantial new administrative and legal burdens on cities by requiring ongoing verification of contractor compliance, mandatory contract disclosures, and extensive recordkeeping subject to rapid state audit. These requirements transform routine contracting functions into compliance oversight roles, requiring cities to annually validate contractor status, maintain auditable documentation for multiple years, and respond to CARB inquiries within tight timeframes. Collectively, these changes create additional unfunded mandates, increase administrative complexity, and elevate legal and procurement risks, while also placing upward pressure on contract costs and potentially limiting competition among vendors unable to meet evolving regulatory thresholds.

The City of Santa Clara has been actively advancing fleet decarbonization through strategic procurement, infrastructure planning, and long-term investment in zero-emission transportation solutions and bridge technologies where zero emission options may not exist. Since 2020 the City has converted approximately 10% of its fleet from internal combustion engines with the procurement of more than 80 light and medium duty zero emission vehicles. The City also continues to expand its EV charging infrastructure at City facilities for both Fleet and Public use with ongoing projects funded and continuing into the foreseeable future. The City has utilized funding opportunities to assist in the planning, implementation and procurement of zero emission vehicles and related infrastructure. In addition to zero-emissions vehicles, it has implemented other strategies to reduce its carbon footprint such purchasing hybrid vehicles when zero emission options are not available and introducing the use of 100% renewable diesel exclusively since 2020.

While the City remains committed to statewide climate and air quality objectives, the administrative and financial implications of the proposed regulatory requirements are significant. Ultimately, the cumulative expenses associated with vehicle procurement, infrastructure development, and administrative compliance would fall to local governments and, by extension, taxpayers. The City of Santa Clara respectfully requests that CARB consider these operational and fiscal impacts as it evaluates regulatory pathways to achieve statewide decarbonization goals.

While the proposed amendments significantly increase obligations on local municipalities, we appreciate the amendments to provide increased compliance flexibility by delaying the 100 percent zero-emission vehicle purchase requirement from 2027 to 2030 and expanding eligibility for exemptions and extensions related to infrastructure constraints, operational limitations, and emergency response needs.

However, to prevent unintended consequences that could jeopardize life, property, and essential services, we respectfully urge the Board to reject these newly proposed mandates on cities and rather request that CARB establish clear, categorical exemptions, consistent with those in Section 2013(c) of Title 13 of the California Code of Regulations for city vehicles that respond to, support, and recover from emergencies and disasters.

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

Sincerely,



Jovan D. Grogan
City Manager
City of Santa Clara