

Tri-Valley Cities

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April 16, 2026

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

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

On behalf of the Tri-Valley Cities Coalition, representing the communities of Danville, Dublin, Livermore, Pleasanton, and San Ramon, we respectfully submit this letter in opposition to the proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation.

While we recognize and support the State's long-term goals to reduce emissions and transition to cleaner vehicle technologies, the proposed modifications introduce new compliance obligations that would significantly affect local governments in ways that extend beyond traditional fleet operations. As outlined in CARB's notice, the amendments expand the regulatory framework governing fleet compliance and implementation responsibilities.

Of particular concern is the application of these requirements to private fleets that contract with municipalities. Under the proposed changes, cities would be required to incorporate regulatory disclosures into contracts and annually verify contractor compliance with CARB's ACF requirements. This effectively shifts responsibility for emissions compliance into the contractual and administrative domain, placing additional burdens on local agencies that are not fleet operators themselves but rely on contracted services to carry out essential public functions.

For many cities, these changes would necessitate modifications to procurement processes, contract management practices, and compliance tracking systems. These are not minor adjustments; they represent a fundamental restructuring of how municipalities engage with service providers such as waste haulers, construction contractors, and maintenance vendors. The added administrative workload and potential liability exposure raise significant concerns, particularly for smaller jurisdictions with limited staffing and resources. Additionally, it remains unclear whether cities would be expected to track and report on contractor fleets that serve multiple jurisdictions, such as regional waste haulers. This ambiguity creates the potential for duplicative reporting requirements across multiple agencies and introduces significant administrative inefficiencies.

At the same time, our member agencies remain committed to advancing the State's clean fleet transition where feasible. Across the Tri-Valley, cities have prioritized the procurement of ACF-compliant and zero-emission vehicles whenever practicable, including in instances where such purchases are not yet required. However, there remain significant gaps in the availability of zero-emission options for specialty vehicles critical to public works operations, including infrastructure maintenance, water and wastewater service, and emergency response.

In many cases, currently available zero-emission vehicles are not operationally suitable for municipal use. For example, maintenance crews require vehicles capable of carrying specialized equipment and utility boxes throughout the day. Existing zero-emission truck options often cannot accommodate these configurations, resulting in inefficiencies such as the need for staff to return to maintenance yards multiple times per day to swap equipment. Under emergency conditions,

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operational response cannot be deferred to accommodate vehicle charging needs, and services must be performed without interruption to ensure public health and safety.

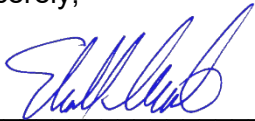
Cost is also a significant factor. In some cases, the only available zero-emission options for maintenance fleets come at a substantially higher cost than traditional vehicles, even for basic configurations. Local governments must balance sustainability goals with their responsibility to be prudent stewards of public funds, and the current market limitations make that balance increasingly difficult to achieve.

Given these considerations, the proposed modifications, including expanded compliance requirements related to contractors, increased administrative burdens, and accelerated transition expectations, may limit procurement flexibility, increase operational costs, and constrain cities' ability to maintain critical public services.

Given these considerations, we respectfully urge the California Air Resources Board to reconsider the proposed modifications and further evaluate their impacts on local governments. At a minimum, additional stakeholder engagement, clearer implementation guidance, and the inclusion of reasonable timelines, exemptions, or alternative compliance pathways for specialty vehicles are needed to ensure that cities are not disproportionately burdened by requirements that fall outside their direct operational control.

Thank you for your consideration of these comments.

Sincerely,



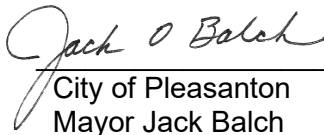
Town of Danville
Mayor Newell Arnerich



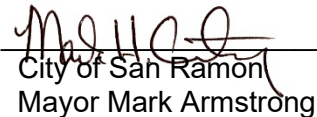
City of Dublin
Mayor Sherry Hu



City of Livermore
Mayor John Marchand



City of Pleasanton
Mayor Jack Balch



City of San Ramon
Mayor Mark Armstrong

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Cc: Assembly Member Papan
Assembly Member Ortega
Assembly Member Bauer-Kahan
Assembly Member Davies
Assembly Member Dixon
Senator Blakespear
Senator Choi
Senator McNerney

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Senator Grayson