



CITY OF PALM DESERT

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April 16, 2026

VIA PUBLIC COMMENT PORTAL

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

RE: Advanced Clean Fleets 15-Day Comment Period Response - OPPOSITION

Dear Honorable Chair Sanchez,

The City of Palm Desert appreciates the opportunity to comment on the proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation.

Palm Desert is advancing decarbonization through regional programs, energy efficiency improvements, and phased deployment of electric vehicles and charging infrastructure. However, cities must balance these efforts with the obligation to provide uninterrupted public services. The proposed modifications do not adequately account for the operational realities of local government fleets, particularly those supporting emergency response and critical infrastructure.

City fleets are essential to protecting public health and safety. In Palm Desert, extreme desert conditions, including prolonged triple-digit temperatures, flooding, and earthquake risk, directly affect vehicle performance, battery efficiency, and charging reliability. During emergencies, vehicles must operate continuously to support fire response, medical aid, search and rescue, and critical utilities. Mandating rigid fleet transitions without proven technology and infrastructure risks reduced readiness, delayed response, and compromised safety. Without clear, durable exemptions, the regulation may hinder disaster response and essential service delivery.

The proposed amendments also expand local government liability by extending compliance obligations to private contractors. Redefining “waste fleets” to include contracted providers shifts compliance risk to cities, increasing costs and limiting procurement flexibility for services such as waste hauling and public works. This change may reduce contractor availability and hinder the City’s ability to secure reliable, cost-effective services.

The proposal further imposes significant administrative and legal burdens. Cities would be required to verify contractor compliance, incorporate new contractual provisions, and maintain records subject to audit. These unfunded mandates increase administrative complexity, elevate legal risk, and place upward pressure on costs while limiting vendor competition.

California Air Resources Board

April 16, 2026

Page 2

While the City acknowledges provisions delaying the 100 percent zero-emission vehicle purchase requirement to 2030 and providing some flexibility for infrastructure and operational constraints, these changes do not sufficiently mitigate the impacts of the proposed mandates.

To avoid unintended consequences that could jeopardize essential services, the City of Palm Desert urges the Board to reject the expansion of local government obligations and instead adopt clear, categorical exemptions consistent with Section 2013(c) of Title 13 of the California Code of Regulations for vehicles used in emergency response, infrastructure support, and disaster recovery.

Thank you for your consideration.

Sincerely,



Evan Trubee

Mayor

cc: Senator Rosilicie Ochoa Bogh
Assembly Member Greg Wallis
League of California Cities, cityletters@cacities.org