



April 17, 2026

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

*Brett Taylor*  
Mayor

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

*Liz Wynn*  
Vice Mayor

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

*Steven A. Nelsen*  
Councilmember

The City of Visalia sincerely appreciates the time and effort that has gone into the proposed amendments to the Advanced Clean Fleets (ACF) regulations and the opportunity provide comment, although, the City believes that more than a 15-Day Comment Period should be provided given the breadth and significance of the proposed amendments.

*Emmanuel Hernandez Soto*  
Councilmember

*Brian Poochigian*  
Councilmember

Visalia is a growing city with a population approaching 150,000 covering approximately (40) square miles, and as a full-service City must ensure the uninterrupted delivery of critical public services. As proposed, the amended regulations do not adequately account for the operational realities of local government fleets, particularly those that are called upon to preserve public health and 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, City fleet vehicles must operate continuously for extended periods, often in extreme conditions, to support fire and flood prevention and response, search and rescue, medical response, and the delivery and maintenance of essential utilities such as water, wastewater, stormwater, and flood protection. 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. By redefining "waste fleets" to include contracted service providers, cities can no longer rely on outsourcing to manage fleet compliance and are instead 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 waste hauling, street sweeping, construction, and public works.



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 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.

While the proposed amendments significantly increase obligations on local municipalities, the City does appreciate that the amendments provide increased compliance flexibility by the City who selected the ZEV Milestone Option to switch to the Model Year Option if currently in compliance with regulations, delaying the 100% ZEV Model Year requirement from 2027 to 2030, and flexibility expanding eligibility for exemptions and extensions related to infrastructure constraints, operational limitations, and emergency response needs. Additionally, the City believes that the replacement of low-emission Compressed Natural Gas (CNG) vehicles should be included in the regulations as an exemption or further extension in the transition requirements, as well as the inclusion of transit vehicles in managing fleet compliance.

However, to prevent unintended consequences that could jeopardize life, property, and essential services, the City respectfully urges 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 the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Sincerely,

Brett Taylor, Mayor  
City of Visalia

cc. Senator Melissa Hurtado  
Assemblymember Alexandra Macedo  
Rajveer Rakkar, [rakkar@calcities.org](mailto:rakkar@calcities.org)  
League of California Cities, [cityletters@cacities.org](mailto:cityletters@cacities.org)