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City Manager

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April 15, 2026

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

RE: Advanced Clean Fleets 15-Day Comment Period Response

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

The City of Sacramento 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 within the City of Sacramento 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.

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.

For more than 15 years, the City of Sacramento has actively advanced decarbonization through strategic fleet procurement, pilot demonstrations, and long term planning. Since the introduction of the Advanced Clean Fleet Regulation, In collaboration with SMUD, the City has conducted detailed assessments of its internal combustion engine fleet to identify viable electric replacements, determine infrastructure needs, evaluate maintenance facility upgrades, and develop cost projections.

Most recently, the City acquired its first electric refuse truck and installed the associated charging infrastructure to support daily operations. Sacramento currently maintains multiple fleet charging hubs across municipal facilities, including the South Area Corporation Yard, North Area Corporation Yard, Meadowview Service Center, Public Safety Center, 300 Richards Boulevard, City Hall, and both Water Treatment Facilities.

The City is preparing to implement a comprehensive, citywide expansion of fleet charging infrastructure by leveraging state and federal grant funding. This initiative is designed to ensure sufficient charging capacity to support future electric vehicle acquisitions and to meet long term fleet transition goals.

In parallel with municipal fleet electrification, the City of Sacramento has prioritized expanding public access to zero emission transportation. Through partnerships with the Sacramento Metropolitan Air Quality Management District, electric vehicles have been made available for community use. Additionally, the City has installed public charging stations at curbside locations and within City owned parking garages to support broader adoption of electric vehicles.

While the City remains committed to statewide climate and air quality objectives, the administrative and financial implications of the proposed regulatory requirements are significant. The level of record keeping, compliance verification, and vendor oversight required under the regulation would impose substantial workload increases and necessitate additional staffing. The City also anticipates higher contract costs as vendors absorb expenses related to compliant vehicles, infrastructure, and reporting obligations. Reduced vendor competition may further elevate costs.

The city procurement staff would become regulatory compliance reviewers by confirming vendor compliance status and reviewing documentation for prime and subcontractors. This will not only take specialized knowledge but also a significant amount of additional time per contract.

The detailed records required for the city to maintain demonstrate that contractors are compliant throughout the life of the contract would require additional storage either via paper documents or a scanned version. This would include collecting annual compliance statements, tracking contractor fleet composition and changes, and ensuring that subcontract information is collected and stored. The steps detailed are for contractors that stay in compliance with the regulation. If a vendor falls out of compliance, the city will then have to identify the violation, notify the contractor, possibly suspend current work or terminate contracts, re-bidding work if needed and managing the legal and financial exposure for the city will be responsible.

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 Sacramento 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,

Maraskeshia Smith

[Maraskeshia Smith \(Apr 16, 2026 13:26:23 PDT\)](#)

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