

April 17, 2026

Nader Heydari
Director

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 Thousand Oaks appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity for us to comment on the 15-day 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, city 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, stormwater, and electricity. 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. Market realities are tightening supply further and major manufacturers like Ford have paused and even discontinued production of the F-150 Lightning, reflecting both supply chain challenges and shifting strategy away from large electric trucks, leaving agencies with even fewer viable options to meet regulatory requirements.

In particular, for public works projects and maintenance tasks, the City of Thousand Oaks utilizes contractors that operate the types of vehicles covered by the regulation. The proposed Article 8, § 2049 requires the City to apply the ACF regulation to contracted fleets, who would now face higher fleet-replacement costs and equipment limitations. For the City of Thousand Oaks, this may reduce the pool of available contractors, potentially making the City's procurement more difficult, result in higher bid prices and generally more costly services, and/or reduce contractor availability and

decrease flexibility for agreements. In addition, the City would have a role in ensuring the contractor's fleet meets the ACF requirements, in addition to the requirements imposed on the City's own fleet. This shift effectively converts municipal procurement and service delivery into a vehicle for state enforcement.

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.

The City of Thousand Oaks is already pursuing decarbonization projects and strategies on multiple fronts. The City just approved approximately \$15 million in projects that include battery energy storage systems and nearly one-hundred Level 2 and Level 3 electric vehicle chargers to support the City's conversion of fleet and transit vehicles to support both ACF and Innovative Clean Transit (ICT) regulations. Further, our City continues to implement solar photovoltaic array facilities, purchase light-, medium- and heavy-duty zero-emission vehicles and support numerous emissions reduction initiatives as member of the Clean Power Alliance.

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 such as Article 8, § 2049 which requires the City to apply the ACF regulation to contracted fleets. Further, we 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.

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Sincerely,



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Public Works Director

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