



# CITY *of* CLOVIS

— COUNCILMEMBER DREW M. BESSINGER —

April 14, 2026

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

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

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

Thank you for the opportunity to comment on the proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation.

The City of Clovis, a community of 130,000 in the San Joaquin Valley, the most polluted air basin in the United States, strongly supports efforts to improve air quality. As a former board member of the San Joaquin Valley Air Pollution Control District for 6 years, I understand both the public-health impacts of vehicle emissions and the economic and operational challenges that overregulation can create for local governments.

Cities provide essential services that must operate continuously during emergencies. Without durable and practical exemptions, ACF requirements risk limiting our ability to respond to disasters, protect public safety, and maintain critical infrastructure.

I am particularly concerned that the proposed amendments expand municipal obligations to include the compliance status of private contractors. Redefining “waste fleets” to encompass contracted service providers shifts compliance oversight onto cities, increasing costs, reducing contractor availability, and limiting flexibility in essential services such as waste collection, street sweeping, transit, and public works. The proposed verification, documentation, and audit requirements effectively create an unfunded mandate and introduce significant administrative and legal burdens.

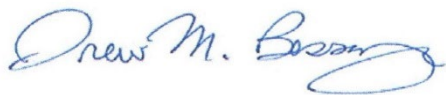
Transitioning to electric vehicles remains extremely costly and operationally unproven for many fleet types. For example, our CNG solid-waste trucks cost about \$800,000 and operate 8–10 hours per day. Equivalent EV units cost roughly \$1.5 million and provide only about six hours of service before charging. Similar challenges exist in transit; Fresno’s recent experience with idle electric

buses illustrates the reliability issues local governments face. Meeting ACF mandates would require expanding our fleet by 40–50 percent and building extensive new charging infrastructure, driving substantial cost increases that would ultimately fall on our residents and businesses. This ripple effect would increase rents and prices of goods and services and have a detrimental effect on our seniors and those who are already struggling financially. Additionally, the increased costs of simply doing business for smaller, privately owned waste haulers would cause most to shutter their businesses or sell out to larger corporate haulers who are better positioned to absorb the significant financial burden that this new rule imposes.

The proposed extensions and expanded flexibility for infrastructure constraints, operational limitations, and emergency response are appreciated. However, to ensure municipalities can continue protecting 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.

Thank you for allowing an opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Sincerely,

A handwritten signature in blue ink that reads "Drew M. Bessinger". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Drew M. Bessinger  
Councilmember  
City of Clovis