



*Office of the Mayor*

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April 15, 2026

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standards Regulations**

Dear Members of the Board:

**On behalf of the City of Fremont, I respectfully oppose the California Air Resources Board's (CARB) proposed amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standards Regulations.** The proposed amendments would update existing provisions in the California Code of Regulations (CCR) regarding state and local government agency fleet requirements, among others.

The City of Fremont is opposed to the proposed amendments for the following reasons:

- **Expanded applicability of ACF requirements.** The proposed amendments would significantly expand the scope of local government responsibility by extending compliance obligations beyond publicly owned fleets to include private contractors operating under municipal agreements. The proposed amendments redefine "waste fleets" to include contracted service providers, meaning 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, especially for essential services, such as waste hauling, street sweeping, construction, and public works.
- **Unfunded mandates.** The proposed amendments impose new administrative and legal burdens on cities by requiring ongoing verification of contractor compliance, mandatory contract disclosures, and extensive recordkeeping, all subject to rapid state audits. These requirements transform routing contracting functions into compliance oversight roles, requiring cities to annually validate contractor status, maintain auditable documentation for multiple years, and respond to CARB's inquiries within tight timeframes. As a result, the proposed amendments impose unfunded mandates, increase administrative complexity, and increase legal and procurement risks, while also placing upward pressure on contract costs and potentially limiting competition among vendors unable to meet such evolving regulatory thresholds.

In general, the City of Fremont supports broader efforts to address the impacts of climate change. I recognize and 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 for infrastructure constraints, operational limitations, and emergency response needs.

Unfortunately, as currently structured, the overall proposed amendments to the ACF regulation do not adequately account for the operational realities of local government fleets, particularly those that support emergency response and essential infrastructure. To mitigate unintended consequences that could

jeopardize life, property, and essential services, I respectfully urge CARB 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 CCR for city vehicles that respond to, support, and recover from emergencies and disasters.

Sincerely,

A handwritten signature in blue ink that reads "Raj Salwan". The signature is written in a cursive style with a horizontal line at the end.

Raj Salwan  
Mayor

cc: The Honorable Dr. Aisha Wahab, California State Senate  
The Honorable Alex Lee, California State Assembly  
League of California Cities