



June 11, 2026

Dr. Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Opposition to Proposed Second 15-Day Amendments to the Advanced Clean Fleets Regulation

On behalf of the League of California Cities (Cal Cities), we write to express our opposition to the California Air Resources Board's (CARB) proposed second 15-day amendments to the Advanced Clean Fleets (ACF) regulation.

While California cities support the State's climate and air quality goals, the proposed amendments would significantly expand the practical reach of the ACF regulation, increasing costs, administrative burdens, and operational challenges for local governments and the communities they serve.

Throughout this rulemaking, local governments, public utilities, contractors, and other regulated entities have consistently raised concerns regarding whether the Advanced Clean Fleets regulation was intended to apply to private companies performing services under contract, franchise, or similar agreements with public agencies. Many stakeholders understood the regulation to apply to fleets owned and operated by governmental entities, not to independently owned and operated private fleets providing services to those entities.

CARB's assertion that the proposed amendments merely clarify existing requirements is difficult to reconcile with the significant and widespread disagreement expressed during this proceeding. If a broad array of stakeholders, including local governments, utilities, and regulated entities, interpreted the regulation differently, the issue is not ambiguity. Rather, it demonstrates that CARB's current interpretation was neither clearly expressed nor reasonably understood to be part of the original regulatory framework. The proposed amendments therefore function as a substantive expansion of the regulation, not a mere clarification of existing requirements.

The amendments also raise broader concerns regarding the role of local governments in implementing and overseeing compliance by private entities. Under the proposal, cities could be required to incorporate CARB-specific requirements into municipal contracts, maintain additional records, and assume responsibility for monitoring compliance by third-party fleets. These activities fall outside the traditional role of local governments and would impose new administrative responsibilities without corresponding funding or resources.

The practical implications for cities are significant. Local governments rely on long-term contractual arrangements to provide essential services, including waste collection, utility operations, public works construction, and infrastructure maintenance. Applying new fleet requirements through these agreements will likely increase procurement costs, reduce competition, create contractual uncertainty, and ultimately increase costs borne by taxpayers and ratepayers.

The proposed amendments are particularly concerning given the State's own findings regarding medium- and heavy-duty zero-emission vehicle deployment. Caltrans' 2025 report ¹to the Legislature identifies ongoing challenges related to vehicle availability, charging infrastructure, operational performance, and acquisition costs. The report notes that in some cases, multiple zero-emission vehicles may be needed to perform work currently accomplished by a single conventional vehicle. These findings demonstrate that significant implementation barriers remain and warrant a more measured approach.

Cal Cities is also disappointed that the amendments do not provide broader exemptions for vehicles supporting emergency response and critical infrastructure operations. Cities, counties, utilities, and special districts have consistently raised concerns that zero-emission alternatives are not yet available or operationally suitable for many specialized vehicle applications essential to public safety and community resilience.

Emergency preparedness requires maintaining vehicles that can respond immediately to wildfires, floods, power outages, public health emergencies, and other unforeseen events. At a minimum, CARB should provide categorical exemptions for vehicles supporting water, wastewater, electric utility, flood control, fire prevention and protection, search and rescue, and vector control operations.

For these reasons, Cal Cities respectfully urges CARB to withdraw the contractor fleet provisions, adopt categorical exemptions for emergency response and critical infrastructure vehicles, and subject any substantive policy changes to a new public rulemaking process.

California cities remain committed to advancing the State's climate objectives. Those objectives are best achieved through policies that are transparent, practical, and reflective of the operational realities facing local governments. We believe the current proposal falls short of that standard and respectfully request that CARB reconsider the proposed amendments.

Sincerely,



Damon Conklin
Legislative Advocate
League of California Cities

¹ <http://dot.ca.gov/programs/legislative-affairs/reports>