

Town Council

Anna Klovstad, Mayor

Courtney Henderson, Vice Mayor

David Polivy, Council Member

Lindsay Romack, Council Member

Jan Zabriskie, Council Member



Department Heads

Jen Callaway, Town Manager

Andy Morris, Town Attorney

Danny Renfrow, Chief of Police

Kelly Carpenter, Town Clerk

Hilary Hobbs, Assistant Town Manager

Nicole Casey, Administrative Services Director

Becky Bucar, Public Works Director/Town Engineer

Denyelle Nishimori, Community Development Director

Paul Bancroft, Neighborhood Services & Sustainability Director

June 15, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleet Second 15-Day Amendments Response

The Town of Truckee appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity for us to comment on the proposed second 15-day amendments.

The Town of Truckee supports California's goals of reducing greenhouse gas emissions and advancing zero emission fleet technologies including electrification. The Town has adopted aggressive targets to reduce emissions to 40% below 2008 levels by 2030, to 80% by 2040 and to achieve carbon neutral by 2045. Our Climate Action Plan includes measures supporting the transition to electric vehicles both in the community and in our own fleet. However, we want to respectfully share some concerns that the proposed amendments would significantly expand the practical reach of the ACF regulation, creating significant operational challenges, adding administrative burdens and increasing costs.

Local governments, including the Town of Truckee, rely on contractual arrangements to provide essential services, including waste collection, public works construction, and infrastructure maintenance. Incorporating CARB-specific requirements into municipal contracts, as contemplated by these amendments, will very likely increase procurement costs, reduce competition, and ultimately increase costs borne by taxpayers. Additionally, we are concerned that under the proposed amendments, cities would be required to incorporate CARB-specific requirements into municipal contracts, take on significant recordkeeping, and assume responsibility for monitoring compliance by third-party fleets. 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.

We are also concerned that the proposed modifications do not adequately account for the operational realities of local government fleets, particularly those that support emergency response. During emergencies, local government fleet vehicles must operate continuously for extended periods, often in extreme conditions, to support fire prevention and response,

search and rescue, winter storm recovery, and the delivery and maintenance of essential utilities. Emergency preparedness requires maintaining vehicles that can respond immediately to these critical events and often requires 24/7 operation. Zero-emission alternatives are not yet available or operationally suitable for some of the specialized applications essential to emergency response, preparedness, and recovery. At a minimum, we request that CARB provide categorical exemptions for specialized vehicles supporting emergency response and preparedness operations that are critical to our community safety.

The Town of Truckee is deeply committed to advancing the State's climate objectives. We believe that these objectives are best achieved through policies that are aggressive, yet also 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,

A handwritten signature in blue ink, appearing to read "Anna Klovstad", with a long horizontal flourish extending to the right.

Anna Klovstad
Mayor