

April 16, 2026

VIA PUBLIC COMMENT PORTAL

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

## **RE: Advanced Clean Fleets 15-Day Comment Period Response**

Chair Sanchez and the Members of the California Air Resources Board:

The City of Seal Beach 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 requirements risk constraining cities' abilities to respond effectively to disasters, maintain critical infrastructure, and safeguard the communities we serve.

The proposed amendments to the ACF regulations significantly expand the scope of local government responsibility by extending compliance obligations beyond publicly owned fleets to include private contractors operating under municipal agreements. By redefining "waste fleets" to include contracted service providers, 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, particularly for essential services like waste hauling, street sweeping, construction, and public works.

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 Seal Beach is taking a phased and fiscally responsible approach to reducing emissions, including evaluating the feasibility of electrifying fleet assets and planning for future charging infrastructure at key City facilities. These efforts require careful coordination of capital planning, utility capacity, and site constraints, all of which must be aligned before meaningful deployment can occur.

The proposed modifications to the Advanced Clean Fleets Regulation would disrupt this measured approach. By extending compliance obligations to contractors, the regulation introduces cost escalation across essential services such as solid waste collection, street sweeping, and construction, as vendors incorporate fleet conversion costs and compliance risk into their pricing. This shift may also reduce contractor availability, further constraining procurement flexibility. Additionally, the requirement for cities to monitor and verify contractor compliance creates a new administrative function that is not currently resourced, effectively transferring regulatory enforcement responsibilities to local agencies. For a small city, like Seal Beach, these combined pressures will necessitate reprioritization of limited funds and staff time, potentially delaying planned investments and forcing implementation decisions on timelines that do not reflect operational or infrastructure readiness.

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 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.

Again, thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Sincerely,

A handwritten signature in black ink that reads "Lisa Landau". The signature is written in a cursive, flowing style.

Lisa Landau  
Mayor  
City of Seal Beach

CC: City of Seal Beach City Council

The Honorable Tony Strickland  
Member, California State Senate  
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The Honorable Diane Dixon  
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