



April 16, 2026

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

RE: Advanced Clean Fleets 15-Day Comment Period Response

Dear Chair Lauren Sanchez and the Members of the California Air Resources Board,
The City of Belmont 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 strict requirements risk constraining cities' ability 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 Belmont has a strong and demonstrated commitment to environmental sustainability and decarbonization. In 2017, Belmont adopted its first Climate Action Plan concurrently with its 2035 General Plan, and the City is currently developing an updated Climate Action and Adaptation Plan. Since 2017, Belmont has reduced its greenhouse gas emissions by 28 percent, exceeding its 2020 reduction target. The City has enrolled in Peninsula Clean Energy's ECO100 program, powering all municipal facilities with 100 percent renewable electricity, and has converted all city streetlights to energy-efficient LEDs. In January 2023, the City Council adopted local reach codes to advance building electrification and electric vehicle readiness in new construction. Belmont has also implemented a streamlined permitting process for residential electric vehicle charging stations and has invested in bicycle and pedestrian improvements, including along the Ralston Avenue corridor. In addition, the City is a member of the U.S. Environmental Protection Agency's Green Power Partnership.

The City's Public Works Department manages the municipal fleet and is committed to exploring fleet electrification where operationally feasible. However, as a small city with limited staff and fiscal resources, the proposed ACF modifications would impose significant new compliance burdens — particularly given that Belmont contracts with Recology San Mateo County, who uses Renewable Natural Gas derived from wastewater, for waste collection services and relies on contracted providers for a range of essential public works functions. Extending ACF compliance obligations to these contracted services would require the City to take on new oversight responsibilities that strain our administrative capacity and could increase costs passed on to Belmont residents.

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.

Sincerely,



Afshin Oskoui
City Manager
City of Belmont

CC: Belmont City Council
Members and Staff of the Assembly Local Government Committee
The Honorable Josh Becker, Senate District 13
The Honorable Diane Papan, Assembly District 21