

April 15, 2026

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

RE: Advanced Clean Fleets – 15-Day Comment Period

Dear Chair Sanchez and Members of the California Air Resources Board,

On behalf of the City of Mountain House, I write to express our opposition to the proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation. While we support the Board’s long-term goals for fleet decarbonization, the proposed amendments as currently structured impose significant new burdens on local governments that are neither accompanied by resources nor consistent with the operational realities of delivering essential public services.

The proposed amendments would extend regulatory compliance obligations beyond publicly owned fleets to include private contractors operating under municipal service agreements. By redefining “waste fleets” to encompass contracted providers, cities are effectively made responsible for ensuring third-party compliance with state mandates—without the legal authority or financial resources to enforce it. This creates unfunded mandates, increases procurement risk, reduces contractor availability, and exposes cities to heightened legal liability. For a city like Mountain House, which depends on contracted services for essential functions including waste hauling, street sweeping, and public works, this shift has real consequences.

The proposed amendments also impose substantial new administrative and legal obligations. Cities would be required to continuously verify contractor compliance, maintain auditable records for multiple years, execute mandatory contract disclosures, and respond to CARB inquiries within tight timeframes. These requirements transform routine procurement functions into ongoing compliance oversight roles—without corresponding funding or staffing support. For small and mid-sized cities with limited staff capacity, the burden is disproportionate.

We are also concerned about the implications for emergency response. City fleet vehicles must be available and operational continuously, particularly during disasters and public health emergencies. Without clear, categorical exemptions for vehicles supporting emergency response, fire prevention, search and rescue, and critical infrastructure, the ACF’s strict purchase and compliance requirements risk impairing the City’s ability to protect our residents when it matters most.

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We do appreciate certain elements of the proposed modifications, including the delay of the 100 percent zero-emission vehicle purchase requirement from 2027 to 2030 and the expanded eligibility for infrastructure and operational exemptions. These adjustments reflect a more realistic understanding of local government constraints, and we encourage the Board to build on that approach.

We respectfully urge the Board to reject the proposed mandates extending compliance obligations to contracted service providers, and to establish clear, durable categorical exemptions—consistent with 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. The City of Mountain House is committed to pursuing responsible decarbonization strategies. We ask that the Board ensure those efforts are not undermined by requirements that exceed our operational and financial capacity.

Thank you for the opportunity to provide comments on these proposed modifications. The City of Mountain House stands ready to work collaboratively with the Board toward achievable, sustainable solutions.

Sincerely,



Andy Su, Mayor
City of Mountain House

cc: Senator Jerry McNerney
Assembly Member Rhodesia Ransom
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