



City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

825 Imperial Beach Blvd., Imperial Beach, CA 91932 Tel: (619) 423-8615 Fax: (619) 628-1395

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 Sanchez and Members of the California Air Resources Board:

The City of Imperial Beach appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity to provide comments on the proposed modifications during the 15-day comment period.

Cities across California are actively pursuing environmentally responsible strategies to decarbonize their communities while maintaining the uninterrupted delivery of critical public services. The City of Imperial Beach supports the State's climate goals; however, 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 communities and provide essential services that protect public health, safety, and welfare. During emergencies, municipal fleet vehicles must often operate continuously under extreme conditions to support fire prevention and response, search and rescue, medical response, and the maintenance of critical utilities such as water, wastewater, and stormwater systems. Without appropriate and durable exemptions, the ACF requirements risk constraining the City's ability to respond effectively to disasters, maintain infrastructure, and safeguard residents.

The proposed amendments 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, the proposal effectively eliminates the ability of cities to rely on outsourcing for fleet compliance. Instead, cities become indirectly responsible for ensuring that contracted operations meet state mandates. This shift introduces increased costs, reduces contractor availability, and diminishes flexibility in negotiating long-term service agreements for essential services such as waste hauling, street maintenance, 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 state audit. These requirements

transform routine contracting functions into compliance oversight roles, requiring annual validation of contractor status, maintenance of auditable documentation, and rapid response to regulatory inquiries. Collectively, these changes create an unfunded mandate, increase administrative complexity, elevate legal and procurement risks, and place upward pressure on contract costs while potentially limiting competition among vendors.

For example, the City of Imperial Beach anticipates that increased compliance costs will be passed through to municipal contracts, directly impacting ratepayers and the City's general fund. Smaller contractors may be unable to meet evolving regulatory requirements, further reducing competition and increasing costs while risking delays or disruptions to critical services, including solid waste collection and emergency response support.

While the proposed amendments significantly increase obligations on local municipalities, the City acknowledges and appreciates provisions that provide increased compliance flexibility, including the delay of the 100 percent zero-emission vehicle purchase requirement from 2027 to 2030 and expanded 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, the City respectfully urges the Board to reject the newly proposed mandates on local jurisdictions. Instead, we request that the Board establish clear, categorical exemptions consistent with those outlined in Section 2013(c) of Title 13 of the California Code of Regulations for vehicles used by cities to respond to, support, and recover from emergencies and disasters.

Thank you for the opportunity to submit this written response regarding the proposed Advanced Clean Fleets Regulation.

Sincerely,



Tyler Foltz
City Manager