

City of Mission Viejo (Wendy Bucknum)



# City of Mission Viejo

Office of the Mayor and City Council

Wendy Bucknum  
Mayor

Brian Goodell  
Mayor Pro Tem

Trish Kelley  
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Council Member

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 Mission Viejo 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 Mission Viejo is committed to environmental stewardship and sustainability through a comprehensive array of green initiatives aimed at reducing the City's carbon footprint and promoting sustainable living within the community. The following is an overview of key projects and programs that the City has completed or currently has underway:

### **Energy Efficiency**

- The City utilizes recycled water for landscape irrigation, with approximately 86% of its 900-plus acres of city-managed landscaped areas—including parks, slopes, medians and city owned Oso Creek Golf Course—irrigated with treated wastewater.
- The City has upgraded the lighting system in City Hall by replacing fluorescent tubes with energy-efficient LED lighting, resulting in reduced energy consumption.
- In its ongoing efforts to modernize the municipal fleet, the City prioritizes the replacement of vehicles with hybrid or electric models wherever feasible.
- To support the transition to cleaner transportation, electric vehicle (EV) charging stations have been installed for City fleet use. Public EV charging stations are planned for installation in 2026, enhancing accessibility and encouraging community-wide adoption.

### **Environmental Initiatives**

- Park renovation projects now include water fountains equipped with bottle refill stations, reducing the reliance on single-use plastic bottles.



- City Council Chambers have adopted reusable water jugs and glasses in place of disposable plastic bottles, setting an example for sustainable practices.
- Landscape and median rehabilitation projects incorporate drought-tolerant and native plant species to conserve water resources and support local biodiversity.
- The City hosts an annual 3rd Grade Environmental Fair, a longstanding program of more than 17 years, to promote environmental education among elementary school students.
- An annual Earth Day celebration features a Green Expo and community planting activities, fostering community engagement with green practices.
- The City recently organized two OC Repair Cafe events, encouraging the repair and reuse of household items to reduce landfill waste.
- Composting is promoted through workshops and giveaways, supporting food scrap composting and backyard gardening among residents.
- Mission Viejo participates in edible food recovery efforts coordinated through the senior luncheon and grocery program at the community center, contributing to landfill diversion and food insecurity reduction.
- Biannual Household Hazardous Waste (HHW) and Electronic Waste (E-Waste) Collection events provide residents opportunities to safely dispose of hazardous and electronic materials, protecting landfills and waterways.
- To streamline operations and reduce paper waste, the City has implemented a digital land management system that eliminates the need for physical copies of plans, permits, and related documents.

Through these initiatives, the City of Mission Viejo demonstrates its ongoing dedication to sustainability, environmental education, and community involvement. These efforts contribute meaningfully to reducing environmental impacts and promoting a healthier, greener community for current and future generations.

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,



Wendy Bucknum  
**Mayor**  
City of Mission Viejo

cc:

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