

City of Los Alamitos (Ron Noda)

The City of Los Alamitos is submitting the attached comment letter regarding the proposed 15-day modification to the Advanced Clean Fleet regulations. While the City fully supports statewide decarbonization goals and continues to implement meaningful sustainability initiatives, the proposed changes would create significant operational, financial, and administrative challenges for small cities such as Los Alamitos.



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 Los Alamitos 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 Los Alamitos remains committed to advancing practical and meaningful decarbonization strategies that reduce emissions while maintaining high-quality public services. The City has already taken significant steps toward sustainability, including transitioning municipal facilities to cleaner energy sources, implementing energy-efficient upgrades across City buildings, expanding recycling and organics diversion programs in compliance with SB 1383, and incorporating low-emission and alternative-fuel vehicles into the fleet where operationally feasible. In addition, the City continues to evaluate opportunities for solar deployment, battery storage, and expanded EV charging infrastructure to support long-term fleet transition planning.

Despite these efforts, the proposed ACF modifications would create substantial challenges for a small city like Los Alamitos. The City operates a compact but highly utilized fleet that supports police services, public works, emergency response, and essential infrastructure maintenance. Many of these vehicles must remain in continuous operation during emergencies, operate in mutual-aid environments, or perform duties that require towing, hauling, or extended idling—conditions that current zero-emission technologies cannot reliably meet. The City also relies on contracted service providers for critical functions such as waste collection, street sweeping, and infrastructure maintenance. By shifting compliance obligations onto municipalities for contractor fleets, the proposed amendments would significantly increase costs, reduce vendor availability, and limit the City's flexibility to procure essential services.

For a small general-law city with limited staffing and financial capacity, the new administrative, legal, and procurement burdens, combined with the need for substantial infrastructure investment, would divert resources away from ongoing decarbonization initiatives and core community services. Without clear exemptions for emergency-supporting vehicles and contracted essential services, the proposed changes risk slowing the City's progress toward sustainability rather than accelerating it.

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,

R. Noda

Ron Noda
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City of Los Alamitos

cc. League of California Cities, cityletter@calcities.org
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