



CITY of CYPRESS

5275 Orange Avenue, Cypress, California 90630 • 714-229-6700 • cypressca.org

April 14, 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 Cypress 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. The City of Cypress is also joining this pursuit by adding its first four all-electric vehicles to the City's fleet during the current fiscal year. The city has also added electric vehicle charging stations at two major parks, making it easier for the public to charge their electric vehicles at City facilities.

Cities must 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. 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.

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.

While the proposed amendments significantly increase obligations on local municipalities, we appreciate the amendments to provide increased compliance flexibility by delaying the 100

Leo Medrano, Mayor

Kyle Chang, Mayor Pro Tem - David Burke, Council Member - Bonnie Peat, Council Member - Rachel Strong Carnahan, Council Member



CITY of CYPRESS

5275 Orange Avenue, Cypress, California 90630 • 714-229-6700 • cypressca.org

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,

Shannon DeLong
City Manager

cc. Cypress City Council
California State Senator Tony Strickland
California State Assembly Member Sharon Quirk Silva
Connor Medina, League of California Cities, cityletters@cacities.org

Leo Medrano, Mayor

Kyle Chang, Mayor Pro Tem - David Burke, Council Member - Bonnie Peat, Council Member - Rachel Strong Carnahan, Council Member