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April 17, 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
City of Los Angeles**

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

Our client, the City of Los Angeles appreciates the CARB’s continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity to comment on the 15-day proposed modifications. We submit this letter on behalf of the City of Los Angeles.

The City of Los Angeles is strongly committed to climate leadership and has adopted some of the most ambitious sustainability and decarbonization goals in the nation, including the LA Green New Deal, PlanLA, and department-specific zero-emission transition strategies across transportation, sanitation, water, and energy systems.

The City has significantly expanded the procurement of zero-emission light-duty vehicles, piloted electric refuse and street-sweeping equipment, invested in renewable energy and charging infrastructure at municipal facilities, and is actively transitioning Los Angeles Department of Water and Power (LADWP) operations toward 100 percent clean energy. These efforts demonstrate the City’s commitment to reducing greenhouse gas emissions while maintaining reliable public services.

However, cities must also ensure the uninterrupted delivery of critical public services. As currently structured, the proposed ACF modifications do not adequately account for the operational realities of Los Angeles’ scale, geography, and service demands, particularly for emergency response, public works, and essential infrastructure.

The City of Los Angeles serves more than four million residents across over 500 square miles and operates one of the largest and most complex municipal fleets in the United States. During emergencies, City fleet vehicles must operate continuously for extended periods, often in extreme heat, wildfire conditions, flooding, debris flows, and earthquake response scenarios.

City departments rely on heavy-duty vehicles, specialized equipment, and contractor-operated fleets to conduct defensible space clearance, debris removal, emergency street repair, stormwater management, and hazardous material response. Insufficient exemptions or accelerated zero-emission mandates absent commercially viable equipment risk constraining the City's ability to respond rapidly and effectively to disasters, directly endangering life, property, and regional resilience.

Of particular concern, the proposed amendments significantly expand local government responsibility by redefining "waste fleets" to include private contractors operating under municipal agreements. The City of Los Angeles relies extensively on contracted fleets for refuse hauling, recycling, organics collection, street sweeping, construction, and public works projects.

By extending ACF compliance obligations to these contractors, the proposal indirectly holds the City responsible for contractor fleet composition, infrastructure readiness, and compliance timelines that are outside municipal control.

For Los Angeles, this change would have immediate practical consequences. Contractors have already indicated that accelerated zero-emission heavy-duty procurement requirements could reduce bidder participation, increase contract costs, or delay service delivery due to limited vehicle availability and charging or fueling infrastructure. In waste hauling and street sweeping alone, reduced competition or delayed fleet turnover could disrupt citywide sanitation services, compromising public health outcomes in one of the nation's densest urban environments.

In addition, the proposed amendments impose substantial new administrative and legal burdens on the City by requiring verification of contractor compliance, mandatory contract disclosures, and extensive recordkeeping subject to audit. For Los Angeles, which manages hundreds of fleet-related service contracts across multiple departments, these requirements would transform routine procurement and contract management into continuous regulatory compliance oversight. The City would be required to annually track contractor-specific vehicle inventories, monitor evolving regulatory thresholds, maintain auditable records for multiple years, and respond rapidly to CARB inquiries—creating unfunded mandates, increasing legal risk, and diverting staff and fiscal resources away from service delivery and emissions-reduction investments.

While the City appreciates the amendments that provide additional flexibility—such as delaying the 100 percent zero-emission vehicle purchase requirement from 2027 to 2030 and expanding eligibility for exemptions and extensions related to infrastructure constraints and emergency response—these accommodations do not sufficiently address the fundamental challenges posed by extending ACF mandates to municipal contractors.

To avoid unintended consequences that could jeopardize emergency response, essential infrastructure, and public health, the City of Los Angeles respectfully urges the Board to

reject the proposed expansion of municipal responsibility over contractor fleets. Instead, we request that CARB establish clear, categorical exemptions, consistent with Section 2013(c) of Title 13 of the California Code of Regulations, for city vehicles and contracted fleets that support emergency response, disaster recovery, public works, sanitation, and critical infrastructure operations.

Thank you for the opportunity to provide these comments and for your continued engagement with local governments as we collectively pursue California's climate goals in a manner that is both ambitious and operationally feasible.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'A. H.' or similar, written in a cursive style.

cc: Members and staff, Los Angeles County Legislative Delegation