

City of La Mirada (Jorge Orozco)

The City of La Mirada respectfully opposes the California Air Resources Board's 15-day proposed amendments to the Advanced Clean Fleets (ACF) regulation.

As proposed, the amendments would shift significant regulatory and administrative responsibilities onto local agencies by requiring cities to monitor, verify, and report on the compliance of private contractors, including solid waste haulers, street sweeping providers, and landscape maintenance contractors. This represents a substantial expansion of local oversight obligations that were not previously required.

The proposed changes would also result in significant cost increases. Contractors will be required to transition to costly zero-emission vehicles and equipment, and those expenses will ultimately be passed on to cities through increased contract costs. In addition, local agencies would incur increased staff time and administrative costs to ensure compliance, along with potential exposure to state penalties for non-compliance.

These requirements constitute a significant unfunded mandate on local governments, placing both financial and operational burdens on cities without providing the necessary resources to implement and enforce the program.

For these reasons, the City urges CARB to reject the proposed amendments.