



June 16, 2026

Dr. Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 9581

RE: Opposition to Proposed Second 15-Day Amendments to the Advanced Clean Fleets Regulation

The City of Lakewood is writing to express our opposition to the California Air Resources Board's (CARB) proposed second 15-day amendments to the Advanced Clean Fleets (ACF) regulation.

The City echoes the points raised by other cities and the League of California Cities (Cal Cities) in its letter of opposition on June 11, 2026.

Specifically, the proposed amendments would significantly expand the practical reach of the ACF regulation, increasing costs, administrative burdens, and operational challenges for local governments and the communities they serve. We urge the Board to withdraw the contractor fleet provisions, adopt categorical exemptions for emergency response and critical infrastructure vehicles, and subject any substantive policy changes to a new public rulemaking process.

CARB's assertion that the proposed amendments merely clarify existing requirements is belied by the concerns raised by numerous municipalities that expansion of the ACF regulation to apply to private companies performing services under contract, franchise, or similar agreements with public agencies represents a significant departure and expansion of the regulation's intended reach. If a broad array of stakeholders, including local governments, utilities, and regulated entities, interpreted the regulation differently, the issue is not ambiguity. The proposed amendments therefore function as a substantive expansion of the regulation, not a mere clarification of existing requirements.

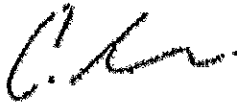
Lakewood

The proposed amendments therefore function as a substantive expansion of the regulation, not a mere clarification of existing requirements. Furthermore, said expansion is not just one of scope, but would impart additional and costly administrative burdens on local governments. Under the proposal, cities could be required to incorporate CARB-specific requirements into municipal contracts, maintain additional records, and assume responsibility for monitoring compliance by third party fleets. These activities fall outside the traditional role of local governments and would impose new administrative responsibilities without corresponding funding or resources.

Lastly, the proposed amendments are particularly concerning given the State's own findings regarding medium- and heavy-duty zero-emission vehicle deployment. Caltrans' 2025 report to the Legislature identifies ongoing challenges related to vehicle availability, charging infrastructure, operational performance, and acquisition costs. The report notes that in some cases, multiple zero-emission vehicles may be needed to perform work currently accomplished by a single conventional vehicle. Cities, counties, utilities, and special districts have consistently raised concerns that zero-emission alternatives are not yet available or operationally suitable for many specialized vehicle applications essential to public safety and community resilience. The proposed ACF regulations completely disregard those concerns, as well as the findings of the 2025 Caltrans report. At a minimum, CARB should provide categorical exemptions for vehicles supporting water, wastewater, electric utility, flood control, fire prevention and protection, search and rescue, and vector control operations.

For these reasons, the City of Lakewood respectfully urges CARB to withdraw the contractor fleet provisions, adopt categorical exemptions for emergency response and critical infrastructure vehicles, and subject any substantive policy changes to a new public rulemaking process.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Chase'.

Cassandra Chase

Mayor