



# Office of the City Manager

September 15, 2025

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Public Comment on Proposed Amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard (LCFS) Regulations**

Dear Chair and Members of the Board:

On behalf of the City of Grand Terrace, thank you for the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard regulations. The City strongly supports California's environmental goals of transitioning to zero-emission fleets, reducing greenhouse gas emissions, and improving air quality. However, as a city of just 3.1 square miles with a very small, low-mileage municipal fleet, we respectfully request that CARB incorporate flexibility and clarity to ensure that compliance is equitable and achievable for smaller jurisdictions.

Grand Terrace operates an on-road fleet of 10 vehicles; primarily used for Public Works and Code Enforcement. Due to our compact size, these vehicles log very low annual mileage compared to fleets in larger jurisdictions. Requiring early replacement of recently purchased internal combustion engine vehicles before the end of their useful life creates a disproportionate financial burden on a city of our size.

In addition to financial impacts, Grand Terrace is concerned about the effect of charging downtime on service levels. With such a small fleet, even one vehicle out of service for charging reduces the City's ability to perform daily maintenance, inspections, and other essential services. CARB should recognize this operational challenge and provide flexibility and funding to help small cities mitigate service interruptions.

The amendments reference terms such as "public agency utility" and "traditional utility-specialized vehicle" [Notice of Public Hearing, AB 1594]. At present, these definitions are not clear enough for small cities to determine which vehicles are covered. For example, it is unclear whether a Ford F-150 used daily by our Public Works staff for citywide maintenance, or a Code Enforcement vehicle used primarily for property inspections, would fall into this category. Grand Terrace requests that CARB clearly define that general municipal service vehicles, such as Public Works pickups and Code Enforcement cars, are not public agency

utility vehicles. This distinction is essential to avoid confusion and ensure that small cities are not misclassified. Similarly, the Daily Usage Exemption references “daily mileage or energy usage” [Daily Usage Exemption Fact Sheet], but it is unclear whether this refers to an annual average, peak usage, or another calculation method. For Grand Terrace, where vehicle mileage is consistently low, this lack of clarity makes it difficult to determine if exemptions apply and how they should be documented.

If the intent of the ACF regulation is to reduce greenhouse gas emissions, the City of Grand Terrace is already achieving this outcome through the inherently low usage of its municipal fleet. With annual mileage levels far below those of larger cities, our operational footprint is already minimal, and our community is contributing proportionally less to vehicle emissions. Recognizing this distinction would allow CARB to achieve its environmental objectives without placing an outsized burden on small cities with low-mileage fleets.

The City of Grand Terrace urges CARB to refine these amendments to ensure that all cities, regardless of size, can successfully and sustainably participate in California’s zero-emission transition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Konrad Bolowich', with a stylized, flowing script.

Konrad Bolowich  
City Manager  
City of Grand Terrace