



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

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

The City of Carlsbad appreciates the opportunity to comment on the proposed modifications to the state's Advanced Clean Fleets (ACF) regulations.

As currently structured, the proposed modifications:

1. Do not adequately account for the operational realities of local government fleets, particularly those that support emergency response and essential infrastructure.
2. Significantly expand the scope of local government responsibility by extending compliance obligations beyond publicly owned fleets to include private contractors operating under municipal agreements.
3. Impose substantial new administrative and legal burdens on cities by requiring ongoing verification of contractor compliance, mandatory contract disclosures, and extensive recordkeeping.

Cities provide vital services that protect public health, safety, and welfare. During emergencies, city fleet vehicles must operate continuously for extended periods, often in extreme conditions, to support fire prevention and response, search and rescue, medical response, and the delivery and maintenance of essential public utilities such as water, wastewater, stormwater, and electricity. To enable cities to respond effectively to disasters, maintain critical infrastructure, and safeguard the communities we serve, we urge the Board to provide exemptions for water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

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. This shift effectively converts municipal procurement and service delivery into a vehicle for state enforcement, exposing cities to increased costs, reduced contractor availability, and diminished flexibility in negotiating long-term service agreements, particularly for essential services like waste hauling, street sweeping, construction, and public works.

In addition, the proposed amendments require 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.

The proposed amendments providing increased compliance flexibility by delaying the 100 percent ZEV purchase requirement from 2027 to 2030 and expanding eligibility for exemptions and extensions related to infrastructure constraints, operational limitations, and emergency response needs are appreciated. However, to prevent unintended consequences that could jeopardize life, property, and essential services, we respectfully urge the Board to reject the newly proposed mandates on cities and 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 support essential public services and infrastructure, and respond to, support, and assist in the recovery from emergencies and disasters.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Blackburn', with a stylized flourish at the end.

Keith Blackburn
Mayor

CC: The Honorable Catherine Blakespear, Senate District 38
The Honorable Tasha Boerner, Assembly District 77