



## CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE ▪ BEVERLY HILLS, CALIFORNIA 90210

**Craig A. Corman, Mayor**

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 to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations**  
**City of Beverly Hills - Oppose**

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

The City of Beverly Hills appreciates the opportunity to comment on the proposed modifications to the Advanced Clean Fleets (ACF) regulation. While we support the State's climate goals and are actively working to reduce emissions, we must respectfully oppose the newly proposed mandates as currently structured.

The proposed amendments to the Advanced Clean Fleets Regulation would significantly expand local government responsibility by extending compliance obligations to private contractors operating under municipal agreements. This shift would effectively make cities indirect enforcers of state regulations, and create new administrative, legal, and financial burdens without providing dedicated funding. Cities would be required to amend contracts, verify contractor compliance annually, maintain audit-ready documentation, and respond to CARB inquiries within tight timeframes, transforming routine procurement into regulatory oversight.

The proposal would also limit procurement flexibility, reduce the pool of eligible vendors, and disproportionately impact small and specialized contractors. Contractors would be even more reluctant to partner with cities, due to these mandates, shrinking an already shallow vendor pool. Increased vehicle costs, infrastructure investments, financing expenses, and compliance administration will ultimately be passed through to cities, placing additional strain on already constrained local budgets.

The City of Beverly Hills has significant operational concerns—many medium and heavy-duty zero-emission vehicles on the market are not able to provide the same level of functionality for

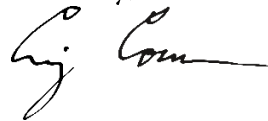
specialized public works use, such as wastewater vacuum trucks, refuse collection trucks, and other specialized vehicles. Limited vehicle availability, supply chain constraints, vehicle upfitting challenges, and electrical infrastructure limitations would further threaten service continuity. Forcing cities to compete with private industry for a limited supply of vehicles would compound to these challenges.

The additional amendments being proposed would exacerbate an already imbalanced structure that would further disadvantage municipal operations and shift compliance costs directly to municipal ratepayers.

For these reasons, we respectfully urge the Board to reject the proposed expansion of mandates onto municipalities in these proposed amendments.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Corman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Craig A. Corman, Mayor  
City of Beverly Hills

cc: The Honorable Ben Allen, Senator, 24<sup>th</sup> District  
The Honorable Rick Zbur, Assemblymember, 51<sup>st</sup> District  
Andrew K. Antwih, Shaw Yoder Antwih Schmelzer & Lange  
Jeff Kiernan, League of California Cities