



April 16, 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 Lauren Sanchez and the Members of the California Air Resources Board,

The City of Highland appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity for us to comment on the 15-day proposed modifications.

Cities across the state are pursuing robust, environmentally sound strategies to decarbonize their communities. However, cities must also ensure the uninterrupted delivery of critical public services. As currently structured, the proposed modifications do not adequately account for the operational realities of local government fleets, particularly those that support emergency response and essential infrastructure.

Cities serve diverse and often expansive communities, providing 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 utilities such as water, wastewater, stormwater, and electricity. Without appropriate and durable exemptions, ACF strict requirements risk constraining cities' ability to respond effectively to disasters, maintain critical infrastructure, and safeguard the communities we serve.

The proposed amendments to the ACF regulations significantly expand the scope of local government responsibility by extending compliance obligations beyond publicly owned fleets to include private contractors operating under municipal agreements. 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 proposal imposes substantial new administrative and legal burdens on cities by requiring ongoing verification of contractor compliance, mandatory contract disclosures, and extensive recordkeeping subject to rapid state audit. These requirements transform routine contracting functions into compliance oversight roles, requiring cities to annually validate contractor status, maintain auditable documentation for multiple years, and respond to CARB inquiries within

Mayor Penny Lilburn	Mayor Pro Tem Jimmy Saldana	City Council Gregory Hogan	City Council Larry McCallon	City Council John P. Timmer	City Manager Carlos Zamano
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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 City of Highland has pursued decarbonization strategies consistent with state and regional climate goals while prioritizing the uninterrupted delivery of essential public services. These efforts include improving energy efficiency at municipal facilities, converting streetlights to LED technology, incorporating renewable energy and energy-efficient building systems where feasible, installing electric vehicle charging infrastructure, and gradually integrating zero- and low-emission vehicles into non-emergency portions of the City's fleet as operational and infrastructure conditions allow. Additional efforts include reducing emissions from waste generation and disposal, adopting city policies that support sustainable development, and implementing complete streets initiatives. Highland's approach recognizes the need for phased implementation, fiscal responsibility, and flexibility given local conditions, including extreme heat, wildfire risk, and the operational demands placed on public works and emergency response vehicles. While the City remains committed to reducing greenhouse gas emissions, prescriptive regulatory requirements that limit local flexibility or extend compliance obligations to contracted essential services risk diverting limited resources away from planned decarbonization investments and compromising the City's ability to protect public health and safety.

While the proposed amendments significantly increase obligations on local municipalities, we appreciate the amendments to provide increased compliance flexibility by delaying the 100 percent zero-emission vehicle purchase requirement from 2027 to 2030 and expanding eligibility for exemptions and extensions related to infrastructure constraints, operational limitations, and emergency response needs.

However, to prevent unintended consequences that could jeopardize life, property, and essential services, we respectfully urge the Board to reject these newly proposed mandates on cities and rather 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 respond to, support, and recover from emergencies and disasters.

Again, thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Sincerely,



Carlos Zamano
City Manager

cc: Laura Varela, Regional Public Affairs Manager
League of California Cities, cityletters@calcities.org