



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

The City of Upland 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 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.

Upland is actively pursuing and advancing decarbonization through its Climate Action Plan (adopted in 2015), which emphasizes reductions in greenhouse gas emissions via transportation planning, energy efficiency, renewable energy adoption, and improvements to municipal operations. These local strategies align with broader state requirements to reduce emissions through land use, mobility, and infrastructure decisions.

The proposed amendments to the ACF regulations would directly and negatively impact the City of Upland by shifting compliance responsibility onto the City for fleets it does not directly control. By redefining regulated fleets to include contracted service providers, Upland would no longer be able to rely on outsourcing to manage regulatory obligations, instead taking on increased administrative oversight and potential enforcement responsibilities. This change is likely to drive up costs as contractors pass through expenses associated with meeting stricter fleet requirements, while also reducing the pool of qualified vendors, particularly for essential services like waste hauling, street sweeping, and construction. Additionally, the City's flexibility in procurement and long-term service agreements would be constrained, creating budget pressures and increasing the risk of service disruptions, ultimately placing a disproportionate burden on the City without corresponding control over compliance outcomes.

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



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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,

A handwritten signature in blue ink, appearing to read "Damien R. Arrula".

Damien R. Arrula
Assistant City Manager

cc: 25th District Senator, Sasha Renee Perez
29th District Senator, Eloise Reyes
41st District Assemblymember, John Harabedian
53rd District Assemblymember, Michelle Rodriguez
League of California Cities
City of Upland Mayor and City Councilmembers
City of Upland City Manager