



City of Needles

817 Third Street, Needles, California 92363
(760) 326-2113 • FAX (760) 326-6765
www.cityofneedles.com

*Mayor Janet Jernigan
Vice Mayor Ellen Campbell
Councilmember Tona Belt
Councilmember Jamie McCorkle
Councilmember JoAnne Pogue
Councilmember Henry Longbrake
Councilmember Larry Ford
City Manager Patrick Martinez*

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,

As Mayor of the City of Needles, I appreciate the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity to comment on the 15-day proposed modifications.

Cities across the state are pursuing environmentally sound strategies to decarbonize their communities while ensuring 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 response, search and rescue, medical services, and the delivery and maintenance of essential utilities such as water, wastewater, stormwater, and electricity. Without appropriate and durable exemptions, ACF requirements risk constraining cities' ability to respond effectively to disasters and maintain critical infrastructure.

The proposed amendments 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 those operations meet state mandates. This shift 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 for essential services such as 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 state audit. These requirements transform routine contracting functions into compliance oversight roles, creating unfunded mandates, increasing administrative complexity, and placing upward pressure on contract costs.


The City of Needles operates a municipal electric utility that supports electrification. The proposed ACF modifications would shift new compliance responsibilities onto cities for private contractors, including annual verification that contracted fleets are compliant, required contract disclosures, and maintaining auditable records subject to state review timelines. For a small, rural community with limited staff and resources, these requirements place additional administrative and operational responsibilities on the City, effectively expanding municipal roles in contract oversight. These changes are likely to increase costs for essential services such as waste hauling and public works, reduce contractor availability, and create additional legal and administrative considerations. As a result, the proposal may divert resources away from core services to support administration of a state regulatory program.

While we acknowledge the proposed flexibility measures, including the delayed zero-emission vehicle purchase requirement and expanded exemptions, they do not fully address the impacts to local governments.

For these reasons, I respectfully urge the Board to reject the proposed expansion of mandates on cities and instead establish clear, categorical exemptions for vehicles and services critical to emergency response, infrastructure, and public safety.

Thank you for your consideration.

Sincerely,


Janet Jernigan
Mayor
City of Needles

cc. Assemblyman Jeff Gonzalez
State Senator Steve Padilla
Laura Varela, Regional Public Affairs Manager, at Lvarela@calcities.org
League of California Cities, cityletters@cacities.org