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April 17, 2026

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Advanced Clean Fleets 15-Day Comment Period Response – Emergency Support Vehicle Exemption**

Chair Liane Randolph and Members of the California Air Resources Board:

On behalf of the Jurupa Community Services District (JCSD), I appreciate the opportunity to provide comments on the Revised Advanced Clean Fleets (ACF) regulation released for the 15-day public comment period. JCSD is a public agency providing water, wastewater, streetlights, graffiti abatement, and parks and recreation services to more than 135,000 residents in the communities of Eastvale and Jurupa Valley. JCSD supports the State's long-term climate goals and appreciates CARB's efforts to refine the ACF framework to better reflect the operational realities of public agencies. However, we remain concerned that the current proposal does not adequately account for the critical role our fleet plays in emergency response and essential service delivery.

As a 100 percent groundwater-dependent agency, JCSD operates infrastructure that must remain functional during power outages, wildfires, extreme heat events, and other emergencies. Our vehicles are essential to monitoring system pressures, maintaining reservoirs, preventing and responding to main breaks and Sewer System Overflows, ensuring uninterrupted water delivery for both public health and firefighting operations. These vehicles must operate for extended durations, often under demanding conditions and without access to charging infrastructure. At present, there are no zero-emission vehicle (ZEV) alternatives capable of consistently meeting these operational requirements, particularly for heavy-duty and specialized utility applications.

As the retail water provider for both Eastvale and Jurupa Valley, JCSD is a recognized leader in emergency preparedness and response. Reliable water and wastewater infrastructure is essential during emergencies, and our District has invested in system redundancy, hydrant maintenance, reservoir capacity, backup power systems, and 24/7



Water



Wastewater



Parks &  
Recreation



Graffiti  
Abatement



Streetlights

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operational readiness to ensure uninterrupted service. We have deployed the first of four planned Heli-Hydrants, a specialized rapid-fill system that significantly reduces helicopter refill times and will begin construction of the first Heli-Hydrant in Eastvale this year. These investments demonstrate JCSD's leadership in advancing innovative, regionally coordinated public safety infrastructure that supports first responders across a wide range of emergency situations.

JCSD appreciates several improvements in the revised ACF framework, including the delayed ZEV procurement timeline and expanded consideration of operational constraints such as payload, range, and duty cycle. These changes better align with real-world conditions faced by utility agencies. However, significant concerns remain. The newly proposed 25 percent cap on fleet exemptions introduces an arbitrary limitation that does not reflect the scale or unpredictability of emergency response. Emergencies do not conform to fixed thresholds, and restricting exemptions may leave agencies unable to fully deploy the vehicles necessary to protect public health and safety.

Additionally, the requirement to submit detailed annual vehicle purchase plans as a condition for accessing exemptions creates unnecessary administrative burden and uncertainty. Public agency procurement is governed by budget cycles, supply chain constraints, and rapidly changing operational needs. Conditioning exemptions on speculative long-term planning may lead to unintended non-compliance and reduce our ability to make fiscally responsible decisions on behalf of our ratepayers.

JCSD also remains concerned about the lack of mature ZEV options for heavy-duty utility vehicles and the absence of a clear pathway to ensure that vehicles are field-tested under the rigorous conditions required for emergency response before mandates are enforced. Without proven, reliable alternatives, premature fleet conversion requirements risk compromising our ability to respond to Public Safety Power Shutoffs, wildfires, earthquakes, and other critical incidents.

To ensure that essential public services are not compromised, JCSD respectfully requests that CARB provide a categorical exemption for vehicles used to respond to, support, and recover from emergencies and disasters. This should include water, wastewater, and other utility service vehicles that play a direct role in protecting public health and safety. At a minimum, CARB should remove or significantly modify the 25 percent exemption cap and eliminate overly prescriptive administrative requirements that limit operational flexibility.

JCSD remains committed to advancing sustainable practices and will continue to evaluate and adopt zero-emission technologies where feasible. However, flexibility is essential to ensure that we can continue to deliver the reliable and resilient services our communities depend on.

Thank you for your consideration of these comments and for your continued work on this important issue. If you have any questions regarding these comments, please contact me at any time or JCSD's Director of Government and Public Affairs, Arman Tarzi, at [GovernmentAffairs@JCSD.us](mailto:GovernmentAffairs@JCSD.us).

Sincerely,



**Chris Berch, P.E.**  
General Manager