



CITY OF MURRIETA

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 Murrieta 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.

The City of Murrieta has been an active partner in advancing the deployment of electric vehicle charging infrastructure across multiple City facilities, with the goal of expanding access and supporting the transition to zero-emission vehicles. These efforts are intended to both encourage EV adoption and ensure that residents, employees, and visitors have reliable and convenient charging options throughout the community.

In addition to local implementation, the City continues to collaborate with regional partners to strategically expand charging infrastructure along key transportation corridors, including Interstate 15 and Interstate 215. These corridors are critical for regional mobility, goods movement, and commuter travel, and the expansion of charging infrastructure along these routes supports broader state and regional climate goals while improving accessibility for long-distance and intercity travel.

Through these coordinated efforts, Murrieta is helping to build a more connected and resilient EV charging network that aligns with regional planning initiatives and supports the continued growth of clean transportation infrastructure.

At the same time, the City remains concerned that current regulatory timelines are outpacing both vehicle manufacturer production capacity and broader market readiness. Recent shifts in vehicle production planning indicate a pullback that may limit the availability of compliant zero-emission fleet vehicles in the near term. This misalignment between regulatory requirements and market conditions presents a challenge for local agencies seeking to comply, despite ongoing investments in infrastructure and planning efforts.

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,



Jon Levell,
Mayor