

County of Riverside (Carolina Herrera)

April 16, 2026

Mr. Craig Segall
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 15-Day Modified Text – Proposed Amendments to Advanced Clean Fleets Regulations for State and Local Government Agency Fleet Requirements

Dear Mr. Segall:

On behalf of the County of Riverside Board of Supervisors, we appreciate the opportunity to provide comments on California Air Resources Board's (CARB) 15-day modified text for public fleets. We thank CARB for the significant 2025 amendments adopted pursuant to AB 1594, which incorporated many of the exemptions, timeline extensions, and flexibilities previously requested. These changes have provided meaningful near-term relief for public fleets.

While the latest iteration reflects important progress, we remain seriously concerned with several operational, fiscal, and public-safety issues that still require further refinement. We therefore respectfully request the following additional amendments:

Exemption Clarifications

In addition to emergency vehicles currently defined in the California Vehicle Code, the following local agency vehicles must be operable 24 hours per day, 365 days per year. Any interruption in their regular use could jeopardize health and safety. The reliability of zero emission vehicles (ZEV) will depend upon a consistently accessible source of electricity, and the risk of disruption during a natural disaster, whether an earthquake, public safety power shut off, rolling brownout, wildfire, or flood, is too great to risk the operability of these vehicles. To maintain the health and safety of our residents during emergency scenarios, we recommend explicitly adding the following exemptions:

- Valve trucks, welding trucks, and other vehicles essential to the repair and maintenance of flood control channels. These are particularly critical during and following the very events that could interrupt the ability of ZEVs to operate.
- Vehicles used by transportation, open space, regional park, and other agencies to spot wildfires, mitigate wildfires, rescue lost or injured hikers, and prevent poaching of animals.
- Vehicles used by mosquito abatement and vector control agencies to prevent and disrupt the proliferation and uncontrolled spread of dangerous known and unknown vectors.

Procurement & Budgeting Challenges

Public agencies must follow the Public Contract Code, which involves more robust processes, including budget approvals, solicitation, procurement, design, permitting, and construction. These processes, combined with supply-chain constraints and competing capital-project demands, make

meeting the proposed schedules more challenging. Funding for even a single charging station becomes a significant hurdle when multiple capital projects compete for limited resources. Costs extend beyond vehicle purchase price and include staff training, infrastructure installation, maintenance, project management, and electricity.

We recommend that CARB consider exemptions for vehicles based on a maximum percentage price as compared to traditional vehicles. Local governments strive to be good stewards of taxpayer dollars. An exemption should apply if the ZEV price exceeds 5% of the cost of a similar traditional vehicle.

Infrastructure in RIVCO's Geographical Landscape

We urge that the regulations consider areas in which EV infrastructure creates insurmountable funding issues for local governments. California's vast geography creates challenges to building out EV infrastructure. The ability to meet electrification standards will vary vastly based on geography, population, and existing infrastructure. Although there are some funding opportunities available, the resources are not deep enough to make the necessary investments to cover the excessive cost of rolling out the appropriate EV infrastructure needed.

With over 7,300 square miles of territory, the vast geography of our County makes the need for "backup vehicles" greater. In an emergency event, the County must be able to deploy vehicles to even the most remote areas, where EV infrastructure does not exist. We request explicit clarification that "backup vehicles" as specified in section 2013.1(a) do not count against the "fleet" calculation.

Financing

The proposed regulations still do not fully account for existing market realities and the time needed to develop and ramp up the infrastructure and systems necessary to support a ZEV fleet. If required to comply with the proposed regulations as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple County departments. There is no current funding mechanism for these increased costs. We strongly encourage the State of California to develop population and needs-based funding allocations to support local government compliance.

Thank you for allowing us the opportunity to provide written responses to the proposed ACF regulations. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or cserrera@rivco.org.

Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors