

# City of Jurupa Valley

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,

The City of Jurupa Valley appreciates the Board's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity to provide comments on the 15-day proposed modifications.

Cities across the state are actively pursuing practical and environmentally responsible strategies to reduce emissions and decarbonize their operations. At the same time, local governments must ensure uninterrupted delivery of critical public services. As currently structured, the proposed modifications do not fully account for the operational realities of municipal fleets, particularly those that support emergency response and essential infrastructure.

At present, the City does not operate fleet vehicles that fall under the current applicability thresholds of the ACF regulation. However, as our operations evolve, it is likely that future fleet acquisitions or service delivery models could bring the city within the scope of these requirements. For this reason, it is critical that the regulation is structured in a way that is both practical and achievable for local governments over the long term.

In addition, the city does not currently have the electrical infrastructure necessary to support large-scale charging of fleet vehicles. Limitations in grid capacity, lack of existing charging facilities, and the significant time and cost required to plan, permit, and construct this infrastructure present real barriers to compliance. Without substantial investment, coordination with utilities, and realistic implementation timelines, cities will face considerable challenges in meeting the proposed requirements.



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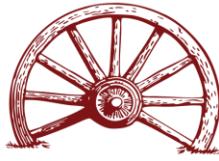
Cities serve diverse and often expansive communities, providing vital services that protect public health, safety, and welfare. Without appropriate and durable exemptions, the ACF's strict requirements risk constraining cities' ability to respond effectively and safeguard the communities we serve.

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 transforms 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 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 rapid state audit. These requirements convert routine contracting functions into compliance oversight roles, requiring cities to annually validate contractor status, maintain auditable documentation for multiple years, and respond to inquiries within compressed 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.

While the proposed amendments significantly increase obligations on local municipalities, we appreciate the effort to provide additional 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 reconsider these newly proposed mandates on cities and instead request that CARB establish clear, categorical exemptions consistent with those outlined in Section 2013(c) of Title 13 of the California Code of



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Regulations for city vehicles that respond to, support, and recover from emergencies and disasters.

Thank you again for the opportunity to provide comments on the proposed Advanced Clean Fleets regulation.

Sincerely,

Rod Butler  
City Manager  
City of Jurupa Valley

By:

A handwritten signature in blue ink, appearing to read 'Paul Foor', is written over a horizontal line.

Paul Foor  
Director of Public Works/ City Engineer

- cc. State Senator Sabrina Cervantes, California's 31st State Senate District  
State Assembly Member Leticia Castillo, California State Assembly, District 58  
Erica Orozco, Inland Empire Regional Public Affairs Manager for the League of California Cities, [cityletters@calcities.org](mailto:cityletters@calcities.org)