



City of Pico Rivera

OFFICE OF THE CITY COUNCIL

6615 Passons Boulevard · Pico Rivera, California 90660 · (562) 801-4371

www.pico-rivera.org

GUSTAVO V. CAMACHO

Mayor

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 Sanchez and Honorable Members of the California Air Resources Board:

The City of Pico Rivera 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

LETTER – 04.16.2026: ADVANCED CLEAN FLEETS 15-DAY COMMENT PERIOD
RESPONSE

Page 2 of 3

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 Pico Rivera is actively advancing a comprehensive, locally driven decarbonization strategy through its recently developed Climate Action & Adaptation Plan (CAAP), which establishes a roadmap to achieve net-zero greenhouse gas emissions by 2045, consistent with State targets. The CAAP identifies transportation as the largest source of communitywide emissions, accounting for approximately 52% and prioritizes actions such as municipal fleet electrification, expansion of Electric Vehicle (EV) infrastructure, and promotion of multimodal transportation systems to reduce vehicle miles traveled and accelerate the transition to zero-emission mobility.

In parallel, the City is undertaking a Zero Emission Vehicle (ZEV) Fleet and Infrastructure Master Plan to evaluate the operational, financial, and infrastructure needs associated with transitioning municipal fleets to zero-emission technologies. This effort reflects the City's commitment to lead by example while ensuring continuity of essential public services and maintaining operational readiness.

While Pico Rivera is making meaningful progress toward decarbonization, the proposed ACF modifications, particularly those that expand compliance expectations to include contractors and private fleets operating under municipal agreements, would significantly affect the City's ability to implement its climate strategies in a cost-effective and operationally feasible manner. These changes risk diverting limited local resources away from planned investments in EV infrastructure, fleet transition, and broader sustainability initiatives identified in the CAAP.

Further, to the extent that CARB intends for local jurisdictions to play a role in enforcing commercial or private fleet requirements, we strongly encourage the State to establish a dedicated funding mechanism to support implementation. Similar to the phased and resource-supported rollout of SB 1383, providing upfront seed funding, technical assistance, and ongoing programmatic support will be critical to ensuring successful, equitable, and consistent implementation across jurisdictions. Without such support, these expanded responsibilities would constitute an unfunded mandate and may hinder, rather than accelerate, local progress toward shared climate goals.

LETTER – 04.16.2026: ADVANCED CLEAN FLEETS 15-DAY COMMENT PERIOD
RESPONSE

Page 3 of 3

While the proposed amendments significantly increase obligations on local municipalities, we appreciate the amendments to provide increased compliance flexibility by delaying the 100% ZEV 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,



Gustavo V. Camacho
Mayor

Cc: Senator Bob Archuleta
Assemblymember Lisa Calderon