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September 15, 2025

Clerks' Office
California Air Resources Board
1001 I Street, Sacramento, California 95814

RE: Comment Letter – Advanced Clean Fleets Amendments/45 Day Changes and Lessons Learned During Emergency Response Operations

Dear California Air Resources Board,

Santa Clarita Valley Water Agency (SCV Water) appreciates the opportunity to provide comments on the proposed 45-day change amendments to the Advanced Clean Fleets (ACF) regulation (45-day changes) as required by Assembly Bill 1594 (Garcia, 2023) [AB 1594]. We also support the comment letters from groups like the Association of California Water Agencies (ACWA) and other water agencies.

While the 45-day changes are a step in the right direction, they fall short of providing a realistic compliance pathway for agencies like ours that are required to respond to emergencies. In order to fulfill the requirements of AB1594, we believe CARB should continue working on the following areas:

1. Improving access to the mutual aid provision without restricting what vehicles can be designated as emergency response vehicles.
2. Improving outreach and communication efforts to public agencies affected by ACF.
3. Collaborating with state agencies to focus all grants and funding to the only regulated fleet group (public agencies).



Photos taken by SCV Water staff responding to the Hughes Fire in Jan 2025

Who we are

Santa Clarita Valley Water Agency (SCV Water) serves a population of more than 278,000 and maintains more than 900 miles of pipe, 75,000+ meters, 26,000+ valves, 7600+ hydrants, 100+ water storage tanks, and 50+ wells.

Our mission is to provide responsible water stewardship to ensure the Santa Clarita Valley has reliable supplies of high-quality water at a reasonable cost. As a water agency, we know firsthand the challenges posed by climate change and have adopted a Sustainability Plan and initiatives aimed at achieving sustainability and resiliency. Our sustainability framework focuses on drastically decreasing SCV Water's energy consumption and greenhouse gas emissions while maintaining the agency's ability to deliver essential services effectively.



Advanced Clean Fleets Regulation Efforts

While SCV Water supports the goals of ACF, we believe the regulation as written presents significant operational risks that could jeopardize our agency's ability to provide essential services, especially during emergencies.

As a result, our staff has been involved throughout the rule-making process by providing comments during public workshops, participating in meetings with industry associations (i.e. Association of California Water Agencies (ACWA), NAFA (the Fleet Management Association), etc.) and by serving in the Outreach Truck Regulation Implementation Group (TRIG).

On June 19, 2025, we also hosted a site visit for CARB staff and had a productive conversation about our operations, challenges we face with implementing ACF, and success stories with deploying ZEVs.

Our goal is to provide CARB with constructive feedback that helps provide a realistic pathway to compliance without jeopardizing our ability to respond during emergencies.

Advanced Clean Fleets Recommendations

1. Improving access to the mutual aid provision without restricting what vehicles can be designated as emergency response vehicles

Our experience with local emergencies, such as the recent LA wildfires, and the 1994 Northridge earthquake has demonstrated to us that zero emissions vehicles cannot be used in emergency response operations. Therefore, we strongly believe that a portion

of a public agency's fleet must continue to be replaced with internal combustion engine (ICE) vehicles to effectively respond to emergencies.

Our agency, like many others, participates in mutual aid efforts with local, state, and federal agencies during emergencies, including fires, earthquakes, and more. Without our ICE vehicles, we would be unable to respond effectively.

Our after-hours staff work 24/7/365, responding to over a thousand calls per year. While most of these calls are minor, some are real local emergencies where our staff work alongside police and fire personnel to protect public health and safety. Here's a summary of the number of local emergencies our staff have responded to: 2021: 216 leaks

- 2022: 213 leaks
- 2023: 208 leaks
- 2024: 190 leaks






The current Mutual Aid Exemption is prohibitive for public agency utilities because it requires a high level of the existing fleet to already be ZEV as a starting point even though the current ZEV market does not have enough ZEVs to even meet the current ZEV targets. **We recommend reframing use of the Mutual Aid Exemption to be tied to a designation of a fleet portion as mutual aid (number or percentage) to better reflect our emergency response responsibilities.** It should also be up to the fleet to determine what vehicles are used for emergency response/mutual aid and replaced with ICE vehicles, regardless of whether a NZEV or ZEV becomes available in the future.

Designation of part of the fleet as mutual aid will also help public fleets navigate the volatile ZEV truck market by not having to purchase unproven ZEVs for emergency response operations. It is important to note that the appropriate number or percentage of mutual aid vehicles will be heavily impacted by the size of the fleet; therefore, further discussion is needed to determine reasonable levels based on fleet size.

Lessons Learned During Emergency Response Operations

- Vehicle Requirements: During emergencies, various types of vehicles are needed to complete various tasks including:
 - Assessing damage to our water system and completing emergency repairs to restore service
 - Staging emergency power generators at facilities that have lost utility power

- Patrolling our service area to prevent hydrant usage by non-emergency personnel
- Driving around and broadcasting boil water notices
- ZEV Charging During Emergencies: ZEV charging would not be possible during an emergency
 - Access to our yards can be lost or impacted.
 - In the most recent LA fires, we had to evacuate one of our main yards and the chargers at that facility were inaccessible
 - During the Northridge earthquake, our yards lost power and it took our utility a lot of days to restore power
 - During the Hughes Fire, we did not have enough portable generators to maintain our water system so supporting EV chargers would not have been possible
 - **Supplier Reluctance During Emergencies:** Suppliers and mobile vendors do not want to operate during emergencies. The propane vendor for one of our emergency generators did not want to refuel our generator because of the proximity to the fire. As a result, we are moving away from alternative fuel (propane, natural gas, etc.) generators and replacing them with reliable diesel generators that our staff can refuel.
 - At home-charging would not have been possible. Our staff also lost power and communication/internet services at home so they would have not been able to charge their work ZEV at home.

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| <p><i>Water storage tank was completely destroyed by the Northridge Earthquake.</i></p> | <p><i>Access road was damaged by earthquake, which required off-road/4X4 trucks.</i></p> | <p><i>Vendors did not want to make deliveries during the LA fires because they were concerned for their staff's safety.</i></p> |

2. Improving outreach and communication efforts to public agencies affected by ACF

Currently, there is a lot of confusion about ACF and whether it is still enforceable. Our rate payers, elected officials, and agency staff all see news headlines that say California is rolling back its emissions regulations. They also see the ongoing legal challenges between the federal government and the State of California, so they have questions on why ACF is still applicable to local governments but not the private sector.

Last year, CARB had an extensive outreach plan that included media ads and outreach events, but that plan has not been implemented. This has resulted in people throughout California believing ACF is no longer enforceable. We currently do not have the necessary tools and resources to explain to our ratepayers why CARB can still regulate state and local governments even though it withdrew its EPA waiver. Therefore, we need extensive outreach and educational materials from CARB that explain in simple terms why ACF is still applicable to local governments even though the rest of regulation has been overturned by the federal government.

3. Collaborating with state agencies to focus all grants and funding to the only regulated fleet group (public agencies).

Since CARB withdrew its EPA waivers requests, the costs of ZEVs will skyrocket while their availability will decrease significantly. In fact, established truck manufacturers and startups have all announced plans to cancel or delay the rollout of new ZEVs. Moreover, grants and incentives at the federal level to transition to zero emissions will also be discontinued. Low market demand and no federal incentives will make compliance with ACF more expensive for state and local agencies. Therefore, additional state funding will be necessary to help implement ACF. Although CARB's report in response to Executive Order N-27-25 highlights the need to "Support local government fleet electrification," it does not go far enough. Since state and local agencies are the only regulated group, they should receive **all** available grant and state funding in order to help implement ACF.

General Comments

- We support expansion of the definition of "Traditional Utility-Specialized Vehicle" (TUSV) to provide agencies with greater flexibility on when to replace vehicles.
 - Our vehicles have high engine hours with low miles since our vehicles idle significantly in order to operate auxiliary equipment, traffic warning lights, and serve as cool down areas for our staff.
- We request that the ZEV Purchase Exemption is modified to reflect the criteria used by public fleets to purchase vehicles that meet our operational needs.
 - As we demonstrated to CARB staff during the site visit, some of our trucks sole purpose is tow heavy equipment such as large generators, pumps, vacuum excavator trailers, etc.
 - Some of the criteria we use when replacing TUSVs **include towing capacity, off-road capability, auxiliary functions, and payload capacity**. If ZEVs do not meet these criteria, then they cannot be considered true replacements because they would be unable to perform their mission.
- ZEV data is very limited and inconsistent. Unlike ICE vehicles, ZEVs are not required to have an OBDII port which makes capturing performance data through telematics very difficult. The data and signals from ZEVs is not standardized to capturing and analyzing data is very difficult. Therefore, CARB should look for ways to help capture and standardize data from ZEVs.

Conclusion

We look forward to working with CARB and other public agencies to develop workable solutions that meet the requirements of AB 1594. SCV Water appreciates CARB's consideration of these comments and the ongoing dialogue with CARB staff. If you have any questions or would like to discuss the comments, please contact me at jramirez@scvwa.org or 661-297-1600.

Sincerely,

Jesus Martinez Ramirez

Fleet and Warehousing Supervisor
Santa Clarita Valley Water Agency