



Westlands Water District

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California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets for Utility Vehicles Regulations

Dear Chair and Members of the Board:

Westlands Water District (District) is the largest agricultural water district in the United States by irrigable acres, serving farms across approximately 614,000 acres which encompasses close to 1,000 square miles in Fresno and Kings counties with advanced water conservation and sustainable management practices. We also provide essential services to disadvantaged communities including Three Rocks, Cantua Creek, as well as the Cities of Huron and Coalinga. The District also provides water to Naval Air Station Lemoore (NASL) for the critical operations supporting the U.S. Navy's Pacific Fleet.

The District appreciates the opportunity to provide comments on the proposed Advanced Clean Fleet (ACF) regulation and recognizes CARB's commitment to advancing clean transportation policies. However, the District remains concerned that the proposed changes to the ACF regulation are insufficient to enable practical compliance for public agency utilities. It is critical that these policies do not unintentionally compromise our ability to respond to emergencies and perform essential operations and maintenance activities.

The District operates a specialized vehicle fleet, of which 28 vehicles are regulated by the ACF. These vehicles are assigned to specific duties, purposes, and personnel, and our fleet has very little redundancy or backup inventory. In responding to emergencies and performing operations and maintenance services, our vehicles should be ready to be operated 24 hours/day, 7 days a week until the situation has been remedied.

Current zero-emission vehicle (ZEV) technology presents significant limitations for our operations:

- **Charging Downtime:** ZEVs require hours for recharging/refueling, which could critically delay emergency response and maintenance activities.
- **Performance in Extreme Heat:** The Central Valley is located in a hot region of the State, especially during the summer months, where temperatures often exceed 100°F. These

conditions significantly affect ZEV battery range, health, charging efficiency and overall vehicle performance.

- **Limited Driving Range:** The range of current ZEV technology severely constrains the District's ability to provide the required services to our water users and landowners.
- **Lack of Charging Infrastructure:** The District boundaries are in rural/agricultural areas without a network of charging infrastructure. Any delays in the WWD's operations and maintenance services could impact public drinking water systems, including those for the City of Coalinga, Lemoore Naval Air Station (LNAS) and other Disadvantaged Communities within the District's service area.
- **Uncertain Off-Road Performance:** Many of our vehicles operate in rugged, off-road conditions typical of rural agricultural environments. The durability, traction, and reliability of current ZEVs under these conditions remain unproven and raise serious concerns about their suitability for our operational needs.
- **Limited ZEV Maintenance Capabilities:** WWD operates its own Auto Shop in Five Points, California, where our fleet is maintained by two mechanics. Currently, there is a lack of available ZEV-specific training and certification courses for mechanics. Without proper training, we will be unable to service and repair ZEVs internally. Sending these vehicles to dealerships or waiting for manufacturer technicians to perform maintenance would result in significant delays and operational disruptions.
- **Manufacturer Solvency and Parts Availability:** There is significant uncertainty surrounding the long-term solvency of ZEV manufacturers and the availability of replacement parts, which raises concerns about the reliability and maintainability of a fully ZEV-compliant fleet.

Due to these concerns, the District respectfully requests that CARB consider adapting the current amendments to the ACF to include some of the following suggestions to ensure timely compliance and successful implementation of the regulations.

Given ongoing concerns regarding the availability, reliability, and serviceability of current ZEV options, the District respectfully requests that the requirement to purchase or attempt to purchase a ZEV prior to requesting a waiver or extension be removed from the regulation. As currently written, the regulation could compel public agencies to settle for a ZEV that does not fully meet the functional, operational, or performance requirements of the internal combustion engine (ICE) vehicle it is intended to replace. This approach risks forcing agencies to invest in vehicles that are ultimately incompatible with their service needs, leading to inefficiencies, increased costs, and potential service disruptions.

(To combat the delays and uncertainties associated with exemption requests and purchase approval, the District recommends the creation of a traditional utility – Specialized Vehicles (TUSV) list. This list would include vehicles that meet the existing definition and are verified to satisfy existing performance requirements of their ICE equivalent. Vehicles on this list could be purchased by public utility agencies without the need for prior information submittals or individual review and approval by CARB,

streamlining the compliance process and reducing administrative burden. Furthermore, given the rapidly evolving ZEV market and frequent changes in vehicle configurations, the District recommends that CARB implement additional mechanisms for ongoing public agency feedback. This could include scheduled public review and comment periods, as well as regularly scheduled meetings with a diverse group of public utility agencies. Such collaboration would help ensure that regulations remain responsive to real-world operational needs and market conditions.

Finally, CARB should coordinate directly with ZEV manufacturers to ensure that mechanic training programs, technical support, and other essential resources are accessible and aligned with the timelines and realities of public fleet transition schedules.

Westlands Water District and its growers uphold an inherent responsibility for the sustainability and efficient management of land and water resources. The current implementation timeline is causing significant financial burdens to WWD due to the cost of current ZEVs and the needed charging infrastructure. The ACF compliance competes for the limited funds the District allocates for capital projects to address our aging water distribution system. CARB should consider phased compliance timelines and considerations for public agencies like WWD in terms of location and operational logistics.

As a Supervisor of Procurement & Fleet Services, I will suggest and encourage CARB's continued collaboration with public agencies to ensure that the regulations are achievable without affecting the safety and reliability of our essential services.

Thank you for your consideration.

Respectfully,



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