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September 15, 2025

Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments on the Advanced Clean Fleets Regulation – Request for Delay and Reassessment for Public Agency Heavy-Duty Fleets**

Dear Chair Randolph:

On behalf of the Inland Empire Utilities Agency (IEUA), we submit these comments for inclusion in the record of the September 25, 2025 public hearing on the proposed amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard regulations.

As a wholesale water supplier and regional wastewater treatment agency serving nearly one million residents in southwestern San Bernardino County, IEUA provides essential public services, including recycled water production, wastewater treatment, and groundwater recharge, that depend on the daily operation of a reliable and responsive heavy-duty fleet.

We respectfully urge the California Air Resources Board (CARB) to delay implementation of ACF requirements for public agency heavy-duty vehicle fleets by a minimum of five years. This delay would allow CARB to revisit key elements of the regulation and reassess the market's ability to supply commercially viable zero-emission alternatives for these critical, public-safety-oriented utility vehicles.

In its current form, the ACF regulation treats vehicles as “commercially available” based on their listing in manufacturer catalogues or announcements. That designation does not reflect on-the-ground readiness for large-scale deployment. For example, IEUA operates heavy-duty GapVax Combe Jetvac Trucks (GapVax), which are essential to emergency wastewater response and have no zero-emission equivalent. These vehicles were deployed during major storm events both in February of 2024 and 2025 to relocate wastewater and prevent sewer overflows. They operated continuously for hours under high-power demands and required sustained availability across multiple remote sites.

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Absent additional time for vehicle development, infrastructure investment, and regulatory refinement, ACF implementation will place public health and safety at risk. Public agencies like IEUA cannot delay emergency response operations. If forced to comply before viable replacements and infrastructure exist, we will be left with the untenable choice of either violating state mandates or relying on diesel generators to power electric vehicles in the field – undermining the intended emissions benefits of the regulation.

A five-year delay for public agency heavy-duty fleets would provide CARB with the opportunity to:

- Reassess what constitutes true “commercial availability” for essential vehicles;
- Allow manufacturers to develop specialized zero-emission units capable of replacing GapVax trucks and similar utility vehicles currently available only with internal combustion engines; and
- Ensure that the necessary infrastructure is in place to support real-world deployment without compromising emergency response capacity.

In addition to a delay in implementation, IEUA requests the following regulatory refinements to the ACF framework:

1. **Formal Appeals Process** – Establish a clear and transparent process for exemption denials, with representation from public agency utilities to ensure fair consideration of critical service needs.
2. **Expanded Emergency Exemptions** – Create a clearly defined exemption for vehicles engaged in public health protection, environmental compliance, and emergency operations. This should explicitly include mutual aid deployments, which are an essential component of California’s public safety and emergency preparedness framework. IEUA alone has participated in mutual aid efforts five times in the past three years alone, underscoring the critical role of fleet flexibility during regional emergencies.
3. **Revision of the Daily Usage Exemption** – Adjust the current daily usage exemption to reflect the intermittent yet essential nature of specialized utility vehicles, which may sit idle for weeks but must operate continuously under extreme demand during emergencies.
4. **Infrastructure Readiness as a Compliance Condition** – Recognize the reality that charging infrastructure, particularly at remote facilities, cannot be built and operationalized within the timelines currently envisioned. ACF deadlines should be contingent upon demonstrated infrastructure readiness.
5. **Ongoing Utility Engagement** – Establish a structured, ongoing process for engagement with public utility fleets under the AB 1594 framework to ensure that unique operational needs are consistently represented in regulatory development.

IEUA remains committed to the long-term decarbonization of our fleet and operations. However, that commitment must be balanced with our responsibility to protect public health and maintain uninterrupted essential services. We respectfully request that CARB recognize that commercial availability must reflect operable, reliable, and affordable vehicles that can perform in the field without compromising public safety.

Thank you for considering these comments. Please feel free to contact Alyson Piguee, Director of External and Government Affairs at [apiguee@ieua.org](mailto:apiguee@ieua.org) or (909) 993-1467 should you have any questions or require additional information.

Sincerely,



Kevin L. Alexander, P.E.  
Deputy General Manager  
INLAND EMPIRE UTILITIES AGENCY