



April 16, 2026

Advance Clean Fleets Group
California Air Resources Board
1001 I Street
Sacramento, CA 95812-0100

SUBJECT: COMMENTS ON THE ADVANCED CLEAN FLEETS – 15 DAY CHANGES

Dear California Air Resources Board:

Rancho California Water District (Rancho Water/District) serves over 150,000 people in Southwest Riverside County. The District's assets include over 1,000 miles of pipes, 100 wells, 40 pumping stations and 100 trucks. We currently have seven megawatts of solar power and are working on another five megawatts of hydro-electric and battery storage projects. Rancho Water currently has 14 fast chargers installed, with plans for many more. Many of our employees have been using all electric and plug in hybrid vehicles for years with great success. Prior to 2024, Rancho Water had Ford Lightnings on order, but Ford cancelled the order due to cost difficulties. Last year Rancho Water received six all-electric Chevy medium duty pickups, with three more anticipated to be ordered this year. We await the availability of Near Zero Electric Vehicles (NZEVs) that can meet our towing needs.

Rancho Water would like to thank the California Air Resources Board (CARB) for the improvements to the Advanced Clean Fleets (ACF) regulation, as shown in the 15-day proposed amendments. These changes will make it easier to comply with the requirements for increasingly electrifying our fleets, while keeping our capabilities to serve our customers, even during times of emergencies. We agree and align our comments with the letter sent by the Association of California Water Agencies (ACWA) and would like to highlight a few items in this letter. Here are proposed amendments we support:

- Extension of the 50% purchasing requirements until 2030.
- Improvements to the Fleet Resiliency Exemption to acknowledge not just emergency response, but towing needs, range and payload limitations of available vehicles.
- Clarifications on the e exemption process, including for order cancellations, rounding of credits, and the manufacturer requirements for a vehicle to be listed as "available to purchase".
- Adding digger derrick trucks, Jetter trucks and even pickups back into consideration of possible purchase exemption listed vehicles.
- Increased allowability of NZEV truck purchases to meet our needs.

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Still, there are items that will need to be corrected in the future, and we hope that CARB will keep an open dialog going to help modify the language in the future. We will continue to work with ACWA and other associations to bring these needs to CARB.

Of particular concern to us is vehicle availability and repairability. We tend to purchase vehicles in bulk from major manufacturers, to ensure parts stocked in our maintenance department are compatible. We've previously had Ford vehicle orders cancelled and now they have shut down the Ford Lightning Assembly line altogether we are concerned that other manufacturers may follow suit. We need manufacturers that will be in existence for decades, so that warranty repair work may be performed and parts are available for in-house repairs thereafter at least through the minimum useful life of the vehicles. We support the "right to repair" legislative efforts, that would stop manufacturers from requiring repair works to be only provided by their authorized dealerships.

We appreciate the change from Mutual Aid Assistance Exemption to Fleet Resiliency Exemption, including not only emergency response needs, but also that towing and range needs may be accommodated through this exemption. We understand that this exemption does not apply if there is an available NZEV that can meet the vehicle requirements, but this should be written that it applies even after the year 2035. Also, the Fleet Resiliency Exemption is capped at 25% of the fleet, but we request that this may be extended to 50% of the fleet for those vehicles whose range and payload needs cannot be met by available ZEVs.

Also, so that we can ensure the vehicles available to purchase will meet our needs, we would like CARB to require manufacturers to list not only the Gross Vehicle Weight Rating (GVWR), but also the Gross Combination Weight Rating (GCWR). The manufacturers should also be required to publish the mileage ratings at the full listed GVWR and GCWR weights.

We look forward to continued engagement on these issues.

Sincerely,

RANCHO CALIFORNIA WATER DISTRICT



Thomas A. Greene
Operations Analyst