

**Department of Water
Resources**

Matt Satow
Director



Divisions

Drainage
Finance & Administration
Water Supply

County of Sacramento

April 14, 2025

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets 15-Day Comment Period – Request for Public Safety Exemptions

Chair Lauren Sanchez and Members of the California Air Resources Board:

The Sacramento County Department of Water Resources (DWR) appreciates the opportunity to submit comments during the Advanced Clean Fleets (ACF) 15-day comment period. We strongly support the State's clean air and climate goals and remain committed to doing our part in advancing fleet electrification. However, we write to respectfully urge the Board to adopt meaningful exemptions for vehicles that perform essential public safety and emergency response functions, for which gasoline-powered vehicles currently remain the only operationally reliable option.

Sacramento County DWR serves a region of more than 1.5 million residents across 1,000 square miles, managing critical water supply, flood protection and stormwater resources. Our vehicles do not merely transport employees — they carry specialized equipment into active flood zones to maintain levees and storm water infrastructure, including pumping facilities, storm pipes, creeks, channels and basins under emergency conditions. Our vehicles carry staff and equipment to respond to water main and water production plant failures affecting public health and fire protection, and support disaster recovery operations that can span multiple days and unpredictable terrain. These activities require vehicles that can operate continuously, often in areas without charging infrastructure, under conditions that can exceed the current capabilities of zero-emission vehicle (ZEV) technology.

Beyond operational reliability, the current ACF mandates impose significant financial burdens on local agencies already managing constrained public budgets. ZEV alternatives for the specialized heavy-duty and utility vehicles used in water and flood operations carry substantial purchase price premiums, and the costs associated with charging infrastructure installation, grid upgrades, and ongoing maintenance are substantial. These costs are ultimately borne by ratepayers and county residents.

Without phased timelines, financial assistance, or targeted exemptions, local agencies like DWR face the prospect of diverting critical resources away from core infrastructure and public safety services to meet compliance deadlines.

Compounding these concerns is significant uncertainty in the ZEV marketplace. For many of the specialized vehicle types used in water utility and emergency response operations, compliant zero-emission models are simply not yet commercially available in sufficient quantities or configurations to meet our needs. Supply chain constraints, limited manufacturer offerings, and extended lead times mean that even agencies prepared to invest in ZEVs may be unable to procure compliant vehicles within the mandated timeframes. Imposing strict compliance deadlines without accounting for market readiness places agencies in the untenable position of being penalized for circumstances beyond their control.

DWR joins the California Special Districts Association, League of California Cities and California State Association of Counties in respectfully requesting that the Board amend the ACF regulations to provide categorical exemptions — consistent with the framework established in part (c) of § 2013 of title 13 of the California Code of Regulations — for vehicles that respond to, assist in, and recover from disasters and emergencies. Specifically, we request that the following categories be exempted:

- Water utility and water supply emergency response vehicles
- Flood protection and levee maintenance vehicles
- Stormwater and drainage emergency response vehicles
- Vehicles supporting fire prevention, fire protection, and evacuation operations
- Search and rescue support vehicles
- Disease and vector control vehicles

Without these exemptions, Sacramento County DWR faces an untenable choice: comply with ACF mandates on an aggressive timeline or maintain the operational readiness needed to protect lives, property, and public health during emergencies. The current regulation does not adequately account for the mission-critical nature of public utility emergency response, the affordability constraints facing local government agencies, or the real-world limitations of ZEV availability and technology in these demanding applications.

We are eager to work collaboratively with CARB toward a clean fleet future. We ask only that this transition allow sufficient time and flexibility so that public safety is never compromised, ratepayers are protected from undue financial burden, and agencies are not penalized for market conditions outside their control. We respectfully urge the Board to adopt the requested exemptions and to continue engaging with local agencies as implementation progresses.

Thank you for your consideration of these important concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Satow". The signature is stylized with a large "M" and a prominent "S".

Matt Satow, Director
Sacramento County Department of Water Resources