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Chair Lauren Sanchez
And Members of the California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Imperial Irrigation District Comments to the Advanced Clean Fleets 15-Day Changes

Chair Sanchez and Members of the Board:

The Imperial Irrigation District (IID) appreciates the opportunity to comment on the proposed 15-day change amendments to the Advanced Clean Fleets (ACF) regulation, as required by AB 1594, and welcomes continued engagement on this important matter. IID is an irrigation district and a public power provider representing some of the most economically disadvantaged and underserved communities in the state. Our predominately rural service territory encompasses all of Imperial County, parts of Riverside and San Diego Counties, and spans several thousand square miles. Keeping the needs of the community it serves in mind, IID maintains the lowest irrigation and electric rates in the State of California.

IID supports a comprehensive strategy to accelerate the transition to zero-emission vehicles (ZEVs), provided that such vehicles are commercially available, operationally proven, and suitable for electrification within the context of public fleet operations. IID also advocates for the comments submitted by the California Special Districts Association, Association of California Water Agencies, Southern California Public Power Authority, and the California Municipal Utilities Association.

The Imperial Irrigation District appreciates the extension of the 50 percent purchase requirement to 2030, from the previously proposed 2027 deadline, as this adjustment better aligns regulatory expectations with current infrastructure limitations and operational realities. However, CARB's 15-day modifications introduce substantive policy changes with direct implications for public agency operations. We are concerned that advancing these changes through a limited 15-day comment period risks undermining the intent of the rulemaking process and restricts the District's ability to fully evaluate the associated fiscal, legal, and operational impacts.

While IID acknowledges the progress made in the proposed amendments, additional changes are still necessary to ensure the regulation is workable for public agencies and fully addresses all remaining challenges.

IID's top priority is ensuring the safe, reliable and continuous delivery of water and power services to our local communities, as well as committing to the safety of our employees, by providing them with the tools and equipment necessary to perform their inherently dangerous work under all weather conditions. In this context, IID remains concerned that the proposed ACF requirements could jeopardize and impair its ability to prevent outages

and restore essential services, not only during emergencies but also during routine operations, by restricting and limiting the availability and utilization of critical vehicles needed to maintain and repair vital infrastructure.

To address these concerns, IID respectfully offers the following recommendations:

Continued ACF Evaluation

In order for the ACF regulation to be workable over time, CARB must remain willing to implement the spirit and intent of AB 1594, and revisit, refine and acknowledge elements of the regulation as it is affected by evolving real-world conditions. It is imperative that public agencies have adequate time to fully evaluate fiscal, legal, and operational impacts so we can provide meaningful input consistent with the intent of the rulemaking process.

CARB's elimination of the distinct "public agency utility" category, along with the extension of AB 1594 flexibilities to all state and local government fleets, reduces administrative burdens associated with fleet categorization and broadens access to the exemptions for all public agencies. However, CARB should ensure that the unique operational demands of utility fleets, particularly those related to grid reliability and public health and safety, remain fully understood as exemptions are re-evaluated.

The introduction of "good engineering judgment" as a guiding standard underscores the importance of clear, consistent application across fleets, as well as transparency in how discretionary determinations are made over time. While IID recognizes the need for such a standard, we are concerned that, as drafted, reliance on "good engineering judgment" alone is insufficient to determine eligibility for exemptions. Instead, exemption applications should be evaluated not only on engineering considerations, but also on feasibility and maintaining appropriate preparedness for emergency response.

At the same time, the context surrounding implementation of this rule continues to change, including shifts in federal policy affecting ZEV incentives, evolving manufacturer plans, product availability, and recent real-world emergency events that underscore the operational demands placed on utility fleets. IID's declared September 2025 Storm event, for example, reinforced the unpredictable nature of emergency events and the critical importance of maintaining reliable, readily deployable specialty vehicles for emergency response, mutual aid, and service restoration. Despite the meaningful improvements reflected in the 15-day changes, those changes fail to reflect the fact that the medium- and heavy-duty ZEV market for utility vehicles continues to face significant uncertainty related to vehicle availability, delivery timelines, infrastructure readiness, availability of federal and state incentives, and vehicle performance across diverse and demanding operating conditions. Taken together, these realities highlight the need for continued stakeholder communication and regular ACF Regulation evaluation of mandatory timelines and advancements in manufacturer technologies so that the ACF rule can be implemented in a way that reflects actual market conditions and the essential public services provided by public utilities.

Greater Public Fleet Flexibility

Provide greater flexibility for public fleets by expanding exemptions or compliance pathways and remove the barriers for vehicles that are critical to emergency response, outage

restoration, and essential infrastructure maintenance. While many of the 15-day changes attempt to reduce administrative burdens, the multiple added qualifiers in the available exemptions offer limited relief and actually add additional cumbersome requirements.

As written, the regulation inappropriately empowers authority in the CARB Executive Officer. Such complete and broad regulatory control should not be vested in a single individual, particularly one who is not elected. Improvements to the ZEV Purchase Exemption Streamlined List and acknowledgement of the ZEV maintenance process will provide enhanced clarity, and include the involvement of manufacturer and stakeholder input that results in a process government fleets can support.

The functionality of the ZEV purchase exemption is essential to the success of the ACF regulation, as the regulation does not function if public agencies are forced to make purchases of vehicles that are not available and do not meet fleet specific needs. The regulation's definition of configuration only considers the highest classification of a vehicle (e.g. bucket truck, work truck), but does not consider auxiliary equipment, payload, towing, or off-road capabilities. If IID cannot ensure that ZEVs meet the specifications required for the vocational application, we risk being unable to respond to emergencies and system maintenance demands.

Remove Limitations to the Fleet Resiliency Exemption

The restructuring of the former Mutual Aid Assistance exemption into the Fleet Resiliency Exemption reflects a meaningful improvement and shows that CARB has responded to several of the concerns raised by Public Agencies. IID will continue to urge CARB to preserve flexibility in the exemption structure for public agency utilities, whose fleets must remain ready to respond to emergencies, support critical infrastructure, and maintain reliable electric and water services under rapidly changing conditions. Not doing so, dilutes the intent of AB 1594 which expressly states an expectation that emergency response is not limited to traditional natural disasters.

Additionally, IID reiterates its position that vehicles reasonably anticipated to respond to emergency situations or support such efforts should be excluded from the regulation, consistent with other excluded vehicle categories identified in the rule and as supported by CVC Section 165.

In conclusion, IID looks forward to continued collaboration with CARB to further refine the language in a manner that reduces the risks posed by this regulation, and we respectfully request CARB address these concerns, and give proper consideration to the essential services public utilities provide to California communities. The ultimate goal, is continued engagement so that the ACF regulation remains adaptable, enforceable, and grounded in the practical realities facing public utility fleets.

Sincerely,



Jennifer M. Goodsell
General Service Manager