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April 16, 2026

ELECTRONIC MAIL

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

SUBJECT: ADVANCED CLEAN FLEETS 15-DAY COMMENT PERIOD RESPONSE

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

On behalf of Elsinore Valley Municipal Water District (EVMWD), we appreciate the opportunity to provide comments on the proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation. EVMWD is a public, nonprofit water agency that provides water, wastewater, and recycled water services across its service area, which spans 96 square miles and includes the cities of Lake Elsinore, Canyon Lake, and Wildomar, as well as parts of Murrieta and unincorporated areas of Riverside County. EVMWD currently serves approximately 164,000 residents in western Riverside County. Our operations depend on maintaining a reliable and responsive fleet to protect public health, ensure environmental compliance, and deliver uninterrupted service to our customers.

EVMWD supports California's efforts to reduce greenhouse gas emissions and improve air quality. We recognize the importance of transitioning to zero-emission technologies and are actively evaluating opportunities to incorporate cleaner vehicles into our fleet where feasible. However, we remain concerned that the proposed 15-day modifications, while providing clarification in certain areas, do not fully address the operational constraints faced by public water and wastewater agencies.

EVMWD's fleet includes specialized and mission-critical vehicles necessary to support water, wastewater, and emergency response functions. These vehicles must meet stringent performance, payload, and range requirements to respond effectively to water main breaks, sewer overflows, and other urgent situations. Based on current market conditions, zero-emission alternatives for many of these applications remain limited in availability and may not meet the operational demands required for reliable service. The proposed modifications do not sufficiently account for these limitations, particularly where compliance obligations may be triggered regardless of technology readiness.

EVMWD respectfully requests clarification regarding the implementation of the 50 percent zero-emission vehicle (ZEV) purchase requirement in light of the proposed

amendments. Based on our review of the draft language, it is unclear whether the modifications are intended to change the effective start date of the 50 percent ZEV purchase requirement

In addition, the proposed modifications continue to present significant challenges related to infrastructure deployment and cost. Transitioning to zero-emission vehicles requires substantial investment in charging infrastructure, facility upgrades, and coordination with electric utilities to ensure adequate power supply. These efforts involve long planning and construction timelines that may not align with regulatory compliance schedules. As a public agency funded by customers, EVMWD must carefully manage these costs to avoid undue financial impacts while maintaining critical services.

EVMWD respectfully requests that the California Air Resources Board provide additional clarity in the regulatory language, as well as flexibility in implementation timelines and compliance pathways, particularly for fleets that rely on specialized heavy-duty vehicles with limited zero-emission options. We further encourage the Board to expand funding opportunities, incentives, and technical assistance to support infrastructure development and vehicle acquisition. Clear and practicable provisions for extensions or exemptions where technology is not yet commercially available would also help ensure a responsible and achievable transition.

EVMWD respectfully urges the Board to consider the unique operational, financial, and public health responsibilities of water and wastewater agencies as it finalizes the ACF regulation. Thank you for your consideration of these comments. Please contact Erin Sasse, Director of Government Relations, at esasse@evmwd.net or 951-674-3146 Ext. 8229 if you have any questions.

Sincerely,

Ganesh Krishnamurthy

Ganesh Krishnamurthy
Assistant General Manager

ES/mg