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April 15, 2026

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

RE: Advanced Clean Fleets (ACF) – 15-Day Proposed Amendments

Chair Sanchez and Members of the California Air Resources Board:

On behalf of the Mountain Counties Water Resources Association (MCWRA), we appreciate the opportunity to comment on the 15-day proposed amendments to the Advanced Clean Fleets (ACF) Regulation.

MCWRA represents more than 50 water agencies, counties, and local governments across the Sierra Nevada watershed. Sixty percent of California’s developed water begins in these headwaters, making our members’ work essential not only to local communities, but to millions of Californians statewide.

We want to thank California Air Resources Board (CARB) staff for recognizing the challenges associated with implementing ACF and for taking steps to introduce greater flexibility into the regulation. While this process acknowledges CARB’s recognition that the regulations are currently unworkable as adopted, there remains room for improvement to ensure the safety and reliability of water service delivery. The 15-day amendments reflect meaningful progress, including additional time for compliance and improved consideration of emergency response needs. This recognition that not all municipal fleets are the same is an important step in the right direction.

The Core Issue Remains: Workability in Rural California

However, as we have consistently communicated, the amendments do not go far enough. They largely delay, rather than resolve, the fundamental challenges facing rural, forested, and geographically diverse regions.

MCWRA members operate in some of the most demanding environments in the state. Our agencies must respond to:

- Wildfires and post-fire recovery
- Atmospheric river events and flooding
- Public Safety Power Shutoffs (PSPS)
- Severe weather across vast, rugged terrain

These conditions require highly specialized, reliable vehicles that can operate for extended periods, often far from fueling or charging infrastructure. Today, zero-emission—or even near-zero—alternatives do not exist for many of these applications.

Forcing premature transitions under these conditions jeopardizes not only regulatory compliance, but public health and safety.

Affordability and Infrastructure Constraints

This is fundamentally an affordability and infrastructure issue.

Many MCWRA members serve rural communities with:

- Limited electric grid capacity
- Insufficient or nonexistent charging infrastructure
- Long travel distances between service areas

The cost of compliance will ultimately be borne by ratepayers, many of whom are in low-income communities and can least afford increased water rates.

Without meaningful adjustments, the regulation risks placing a disproportionate burden on the very communities least able to absorb it.

Key Areas Where Amendments Fall Short

While we appreciate the direction of the 15-day changes, several core issues remain unresolved:

1. **Lack of Viable Technology for Critical Fleet Functions:** Many essential water and emergency response vehicles still have no feasible zero-emission alternatives.
2. **Insufficient Flexibility for Real-World Operations:** Existing exemptions and compliance pathways remain too narrow, temporary, or conditional to support continuous essential services.

3. **Misalignment with Infrastructure Readiness:** The regulatory framework continues to outpace the availability of vehicles, fueling/charging infrastructure, and grid capacity—particularly in rural regions.

To ensure the ACF regulation is both effective and implementable, MCWRA respectfully urges CARB to:

- Expand exemption and flexibility for essential service fleets, including water, wastewater, and emergency response vehicles
- Allow continued use of viable low-emission technologies where zero-emission options are not yet feasible
- Align compliance timelines with actual market and infrastructure readiness, particularly in rural and mountainous regions
- Recognize the unique operating conditions of Sierra Nevada and headwaters agencies, including elevation, terrain, weather, and emergency response demands

Given the significance of the outstanding issues and the need for additional refinements to ensure the regulation is workable, MCWRA respectfully recommends that CARB:

- Issue an additional 15-day public comment period to allow for further stakeholder input on necessary changes; and
- Bring the revised proposal back before the Board for review and consideration prior to final adoption.

These additional steps will help ensure that the regulation reflects real-world conditions and results in a durable, implementable framework.

MCWRA and its members are committed to advancing California's climate goals. Our agencies will do what they can, when they can, with the resources available to them. But implementation must be grounded in reality. California is not a one-size-fits-all state. Policies must reflect the diversity of conditions across regions—particularly for agencies operating in high-hazard fire zones, across vast and rugged terrain, and under constant threat from extreme weather and power disruptions.

We stand ready to continue working with CARB to develop solutions that achieve emissions reductions without compromising public safety or the reliability of critical water infrastructure.

In conclusion, the implications of ACF extend far beyond fleet compliance. They affect:

- The communities served by our member agencies

- The millions of Californians who rely on Sierra Nevada headwaters for water supply
- The resilience of critical infrastructure during emergencies

We appreciate CARB's continued engagement and look forward to identifying workable, balanced solutions.

Sincerely,

A handwritten signature in blue ink that reads "Justin Caporusso". The signature is fluid and cursive, with the first name "Justin" and last name "Caporusso" clearly legible.

Justin Caporusso, Executive Director

P.O. Box 2479

Placerville, CA 95667

(916) 412-0571