

Lauren Sanchez, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBJECT: Request for Extended Comment Period – Advanced Clean Fleets (ACF) Regulation

April 17, 2026

Dear Chair and Members of the California Air Resources Board,

On behalf of the California Water Association (CWA), we appreciate the opportunity to submit comments on the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) regulation during this 15-day comment period.

CWA represents investor-owned drinking water utilities regulated by the California Public Utilities Commission (CPUC), serving more than 6 million Californians.

Our members are committed to environmental stewardship and support the State's broader climate goals, and we are concerned by the ACF revisions released by CARB in April 2026. These updates appear to introduce significant policy changes, particularly with respect to municipal contracting practices. If interpreted to include fleets of any entity that contracts with a municipality, the revisions could impose substantial new requirements on a wide range of entities, including our members.

Regulated water utilities primarily operate within designated service areas. However, in some cases, our members contract with neighboring cities or special districts to provide essential and specialized services such as water and wastewater operations, treatment plant management and/or billing for city services. If the 15-day modifications are intended to extend compliance obligations to fleets of any entity that contracts with a municipality, this approach would incorporate a wide range of other businesses and could impact the ability of municipalities to procure and contract for services.

The scope of these revisions remains unclear. Given the unique operational structures of our member utilities, several questions arise. For example, if a utility contracts with a community that falls under this regulation, would compliance obligations apply only within that jurisdiction or extend statewide? Additionally, if a utility provides limited services, such as billing which does not require the use of vehicles, would it nevertheless be subject to ACF requirements?



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CWA has significant concerns regarding these developments and requires additional time to fully evaluate their potential impacts. Under California's Administrative Procedure Act, a 45-day public comment period is intended to provide stakeholders with a meaningful opportunity to assess and respond to the full scope of a proposed rulemaking. In contrast, a 15-day comment period is intended for limited, non-substantive modifications. The changes reflected in the April 2026 revisions are substantial and warrant a more comprehensive review period to adequately assess their fiscal, legal, and operational implications.



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Given the potential for these revisions to newly encompass our members, CWA respectfully requests additional time to review and analyze the full impacts of the proposed changes.

Thank you for your consideration of these comments. If you have any questions or would like to discuss further, please feel free to reach out to me at jcapitolo@calwaterassn.com.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer M. Capitolo". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Jennifer Capitolo, Executive Director