



Paradise Irrigation District

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April 15, 2026

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

Subject: Opposition to Advanced Clean Fleets (ACF) – 15-Day Proposed Amendments

Chair and Members of the Board:

On behalf of the Board of Directors of the Paradise Irrigation District (PID), we respectfully submit this letter in opposition to the 15-day proposed amendments to the Advanced Clean Fleets (ACF) Regulation.

While we appreciate the California Air Resources Board's (CARB) continued efforts to refine the regulation, the proposed amendments do not adequately address the operational, safety, and infrastructure challenges facing small and rural water agencies.

Emergency Response and Public Safety

The Paradise Irrigation District serves a community that experienced the devastating Camp Fire. That event demonstrated the critical importance of maintaining full operational readiness during emergencies.

During the Camp Fire and subsequent recovery, PID relied on the **full deployment of its fleet** to maintain system pressure, support firefighting efforts, and restore essential water service. Any limitation on fleet availability would have significantly hindered response efforts.

As previously communicated, reliance on zero-emission vehicles (ZEVs) under current conditions—given limitations in range, charging infrastructure, and power availability—would delay response times and reduce operational effectiveness.

Lack of Feasible Technology

At present, there are **no commercially viable zero-emission alternatives** for many of the specialized vehicles required for:

- Emergency response and system restoration
- Heavy-duty utility operations
- Off-road and rugged terrain work

- Extended-duration deployments

The proposed amendments do not resolve this fundamental issue and instead maintain compliance timelines that are not aligned with technological readiness.

Infrastructure and Operational Constraints

PID operates in a rural, high fire-threat environment with:

- Limited electrical grid capacity
- Minimal charging infrastructure
- Long operational distances

These constraints make compliance with the current ACF framework impractical without compromising the District's ability to deliver reliable water service.

As similarly identified by regional water agencies, these infrastructure limitations and cost burdens ultimately fall on ratepayers, many of whom are in economically vulnerable communities.

Insufficient Flexibility

While the 15-day amendments represent incremental progress, they do not provide the level of flexibility necessary to ensure safe and reliable operations. The regulation continues to:

- Provide limited exemptions for essential service vehicles
- Fail to align with infrastructure readiness
- Overlook the realities of emergency response in rural communities

Recommendations

The Board of Directors of PID respectfully urges CARB to:

- Expand exemptions for essential public service fleets, including water utility vehicles
- Recognize the full range of vehicles required for emergency response and infrastructure protection
- Align compliance timelines with actual market and infrastructure readiness
- Allow continued use of low-emission technologies where zero-emission options are not yet feasible
- Provide additional flexibility for rural, high fire-threat, and disaster-impacted communities

Request for Additional Review

Given the significance of these unresolved issues, we respectfully request that CARB:

- Extend the public comment period to allow for additional stakeholder input; and
- Further revise the proposed amendments prior to final adoption to ensure they reflect real-world operational conditions

Conclusion

The Paradise Irrigation District Board of Directors supports California's long-term climate goals. However, these goals must be implemented in a manner that does not compromise public safety or the reliability of critical infrastructure.

Our experience during the Camp Fire makes clear that **operational readiness, flexibility, and reliability are essential during emergencies**. The current ACF framework, even as amended, does not adequately account for these requirements.

We remain committed to working collaboratively with CARB to develop practical solutions that balance emissions reductions with the essential duty to protect public health and safety.

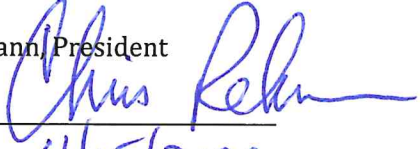
Thank you for the opportunity to provide comments.

Sincerely,

Board of Directors

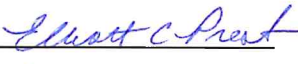
Paradise Irrigation District

Chris Rehmann, President

Signature: 

Date: 4/15/2026

Elliott Prest, Vice President

Signature: 

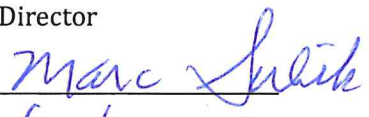
Date: 04/15/2026

Robert Matthews, Director

Signature: 

Date: 4/15/2026

Marc Sulik, Director

Signature: 

Date: 4/15/2026

Patricia Guillory, Director

Signature: 

Date: 4-15-26

