



PLACER COUNTY WATER AGENCY
SINCE 1957

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Andrew Fecko, General Manager

April 15, 2026

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:

We greatly appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While the goals of these regulations are laudable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

Placer County Water Agency (PCWA) serves a region spanning 1,500 square miles. We serve drinking water to a population of about a quarter million people and agricultural water to thousands of acres of land along a 170-mile-long canal system. Most pertinent to the proposed regulations, PCWA operates a hydropower system in the headwaters of the American River watershed. This hydropower system begins with large dams and powerhouses near the summit of the Sierra but is operated out of headquarters in Auburn and Foresthill. Both our canal system and our hydropower system necessitate hours of driving with duty trucks, and thousands of feet in elevation gain for the hydropower system. These trips are necessary in all seasons, including dangerously hot and cold temperatures.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the October 7th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing our state's 5,000 local agencies and 40 million residents.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating unnecessary challenges in complying while maintaining the many critical services Californians rely upon for their most essential daily needs as well as during emergencies and disasters.

Vehicles that need to be categorically exempted from the regulations in the same manner as those found in **part (c) of § 2013 of title 13 of the California code of regulations to** include those vehicles that respond to, assist in and recover from disasters and emergencies to include: water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

In addition, we request a **firm commitment from CARB to re-evaluate the ACF regulations through a public process before 2030**. A scheduled reevaluation would allow the Board and staff to assess whether the regulations accurately reflect real-world ZEV market conditions. These regulations will not be successful if the market doesn't deliver. We recognize that the Board has already directed staff to revisit the rule in 2027, and we appreciate the commitment. However, rather than merely "revisiting" the rule, CARB should explicitly ensure that this will be a transparent public process in which adjustments to the rule can be made based upon real-world market conditions at the time of evaluation.

We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most and that you evaluate the ZEV market conditions ahead of the due date for compliance.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read 'Anthony L. Firenzi', written in a cursive style.

Anthony L. Firenzi, PE
Director of Strategic Affairs

c: PCWA Board of Directors and General Manager