

Sweetwater Authority (Michelle Musgrave)

Please see the uploaded response document for comments from Sweetwater Authority.



SWEETWATER AUTHORITY

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April 16, 2026

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comment Letter – Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations/ 15-day changes

Dear California Air Resources Board:

Sweetwater Authority (Authority) appreciates the opportunity to provide comments on the (15-day) proposed amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard regulations as required by Assembly Bill 1594 (Garcia, 2023) [AB 1594]. The Authority is an urban retail water supplier that provides potable water to approximately 200,000 people in a 36 square mile service area in south San Diego County. We support the state's goals that ACF aspires to reach; however, we want to ensure that our role as an essential public service provider is not jeopardized by ACF's requirements. In general, our concerns are related to flexibility in the regulations for urban retail water suppliers, our vehicles' role in support of emergency response services, and compliance timelines. The Authority's specific comments are as follows:

- **Emergency Support Vehicles:** The Authority strongly urges that all vehicles, including those operated by retail water suppliers/special districts that support emergency response, be categorically excluded from the mandate.
- **Early or Excess ZEV Purchases:** The proposed language requires that credits be used the following calendar year, which is difficult for public agencies that operate in two-year budget cycles who are then at risk of vehicle unavailability and budget uncertainty. Allowing public agencies to bank credits for use post-2030 is a simple solution that would enable fleets to avoid the need to apply for future exemptions while already having purchased ZEVs to add to the overall increase in ZEVs purchased.
- **Fleet Resilience Exemption capped at 25% of fleet and subtracted by other exemptions:** The Authority requests future consideration of flexibility to allow public fleets use of the Fleet Resilience Exemption beyond 25% of their respective fleets, and independent of other exemption pathways utilized.



Clerk's Office, California Air Resources Board
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Carbon Fuel Standard Regulations/ 15-day changes

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Thank you for consideration of these comments. If you have any questions regarding this letter, please contact Xochitl Aranda, Director of Engineering & Operations, at 619-409-6750, or xaranda@sweetwater.org.

Sincerely,

SWEETWATER AUTHORITY



Carlos Quintero
General Manager

CQ:vn

Sent via electronic mail:

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