



Comment letter submitted via electronic commenting system

April 16, 2026

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

RE: Comment Letter – Advanced Clean Fleets Regulation: 15 Day Changes

Dear California Air Resources Board,

Santa Clarita Valley Water Agency (SCV Water) appreciates the opportunity to provide comments on the proposed 15-day change amendments to the Advanced Clean Fleets (ACF) regulation (15-day changes) as required by Assembly Bill 1594 (Garcia, 2023).

While we appreciate the meaningful work and improvements in the 15-day changes, the current language continues to fall short in key areas. In order to fulfill the requirements of AB1594 and provide a realistic compliance path in a volatile EV market, we believe CARB should continue working on the following areas:

1. Improving zero emissions vehicle affordability by removing language that prevents grant funded vehicles from counting towards compliance.
2. Improving access to the Fleet Resilience Exemption by removing the requirement that the number of exemptions cannot exceed the number of ZEVs in the fleet.
3. Removing the count of other approved exemptions towards the Fleet Resiliency 25% cap limit which defeats the purpose of the whole exemption process.

Who we are

Santa Clarita Valley Water Agency (SCV Water) serves a population of more than 278,000 and maintains more than 900 miles of pipe, 75,000+ meters, 26,000+ valves, 7600+ hydrants, 100+ water storage tanks, and 50+ wells.

Our mission is to provide responsible water stewardship to ensure the Santa Clarita Valley has reliable supplies of high-quality water at a reasonable cost. As a water agency, we know firsthand the challenges posed by climate change and have adopted a Sustainability Plan and initiatives aimed at achieving sustainability and resiliency. Our sustainability framework focuses on drastically decreasing SCV Water's energy consumption and greenhouse gas emissions while maintaining the agency's ability to deliver essential services effectively.



Advanced Clean Fleets Regulation Efforts

While SCV Water supports the goals of ACF, we believe the regulation as written presents significant operational risks that jeopardize our agency's ability to provide essential services, especially during emergencies.

As a result, our staff has been involved throughout the rule-making process by providing comments during public workshops, participating in meetings with industry associations (i.e. Association of California Water Agencies (ACWA), NAFA (the Fleet Management Association), etc.) and by serving in the Outreach Truck Regulation Implementation Group (TRIG).

On June 19, 2025, we also hosted a site visit for CARB staff and had a productive conversation about our operations, challenges we face with implementing ACF, and success stories with deploying ZEVs.

Our goal is to provide CARB with constructive feedback that helps provide a realistic pathway to compliance without jeopardizing our ability to respond during emergencies.

ACF 15-day Change Recommendations

We support the comment letters from industry groups like the Association of California Water Agencies (ACWA) and fellow water agencies. **We also want to acknowledge that the 15-day changes are an improvement to the regulation language that was first adopted. However, the changes do not address how volatile the ZEV market has become over the last couple of years.**

15-Day Language Changes We Support

50% Purchase Requirement Extension to 2030

The ZEV market is extremely volatile and shrinking after the federal government removed federal incentives. Traditional OEMs and start ups are losing billions of dollars in EVs and discontinuing EV models. The most concerning examples include Ford discontinuing the Ford Lightning¹, GM discontinuing the Brightdrop van², and Stellantis discontinuing their EV truck before it started production³. **Without these vehicles in the market, we are simply unable to comply with the ACF purchasing requirements.** While we appreciate the extension of purchasing requirements, it is still not enough to navigate this volatile EV market.

ZEV Manufacturer Requirements

We have seen too many ZEV startups end up in bankruptcy; therefore, we welcome the manufacturer requirements that they cannot be in bankruptcy or bankruptcy

¹ <https://www.kbb.com/car-news/ford-cancels-electric-f-150-lightning-plans-erev-instead/>

² <https://www.motortrend.com/news/gm-killing-chevrolet-brightdrop-electric-vans-doubling-chevrolet-equinox>

³ <https://media.stellantisnorthamerica.com/newsrelease.do?id=27063&mid=1>

proceedings if they want to be considered available in the California market. As well the requirement to have CARB Executive Orders for vehicles sold in California for at least three years.

ZEV Purchase Exemption List

We also welcome the addition of mission critical vehicles like vacuum-jetter trucks and class 2b and 3 pickup trucks to the ZEV Purchase Exemption List

ACF Key Areas that Still Need to be Addressed

While we understand that CARB is under a tight deadline to submit changes to the Office of Administrative Law to fulfill its obligations from settlements with the federal government, the following key areas need to be addressed as soon as possible.

ZEV Affordability

1. Improving zero emissions vehicle affordability by removing language that prevents grant funded vehicles from counting towards compliance.

As the only regulated group, public agencies need priority access to funding to comply with ACF. Moreover, the *Vehicles Acquired with Incentive Funds* Section needs to be removed entirely.

(i) *Vehicles Acquired with Incentive Funds. Beginning January 1, 2024, if a fleet owner receives California State-provided incentive funding for ZEVs or NZEVs and the funding program guidelines specify that any vehicles acquired with such funds cannot be used to determine compliance with the ZEV Purchase Schedule of section 2013.1 or ZEV Milestones Option of section 2013.6, any vehicle acquired with such funds shall not be counted as a compliant vehicle during the funding contract period.* The fleet owner shall meet the reporting requirements specified in section 2013.3(c)(2)(M).

The cost of zero emissions vehicles is usually two to four times the cost of a traditional internal combustion engine vehicle. Therefore, all public agencies will be relying on some form of grant funding in order to comply with ACF. The current language penalizes public agencies for using grants to offset the exponential costs of zero emissions vehicles. Therefore, the language should be removed from ACF and state funding program guidelines.

Fleet Resiliency Exemption

Our experience with local emergencies, the recent LA wildfires, and the 1994 Northridge earthquake have demonstrated to us that zero emissions vehicles cannot be used in emergency response operations. Therefore, we strongly believe that a portion of a public agency's fleet must continue to be replaced with internal combustion engine (ICE) vehicles to effectively respond to emergencies. Therefore, we welcome the change of the mutual aid provision into the fleet resiliency provision.

2. Improving access to the Fleet Resilience Exemption by removing the requirement that the number of exemptions cannot exceed the number of ZEVs in the fleet.

(C) The number of exemptions shall not exceed the number of ZEVs in the California fleet as of the date the application is emailed to CARB; and

The current language already has a 5% ZEV fleet requirement in order to apply for a fleet resiliency exemption. Therefore, to require that the number of exemptions cannot exceed the number of ZEVs in the fleet defeats the whole purpose of the fleet resiliency exemption. AB1594 and the mutual aid provision were suppose to help public agencies to effectively respond to emergencies. By limiting the number of exemptions to the number of ZEVs in the fleet it will jeopardize our ability to respond during emergencies.

3. Counting other approved exemptions towards the Fleet Resiliency 25% limit cap defeats the purpose of the whole exemption process.

Our agency, like many others, participates in mutual aid efforts with local, state, and federal agencies during emergencies, including fires, earthquakes, and more. Without our ICE vehicles, we would be unable to respond effectively.

Our after-hours staff work 24/7/365, responding to over a thousand calls per year. While most of these calls are minor, some are real local emergencies where our staff work alongside police and fire personnel to protect public health and safety.

*(D) The total number of exemptions shall not exceed 25 percent of the total number of vehicles in the California fleet **less the number of ICE vehicles already in the fleet purchased pursuant to a granted exemption as of the date the application is emailed to CARB.***

The current language would penalize fleets by counting other approved exemptions towards the 25% fleet resiliency limit cap. If the fleet was successful in receiving an exemption, then they have demonstrated that the ZEV market cannot support their operations and therefore, those exemptions should not count towards the 25% fleet resiliency cap. To include them, would defeat the purpose of the whole exemption process and the goal of AB1594. Therefore, it should be removed.

Conclusion

SCV Water appreciates CARB's consideration of these comments and we look forward to continuing to work with CARB staff and other public agencies to develop workable solutions that meet the requirements of AB 1594. If you have any questions or would like to discuss the comments, please contact me at scole@scvwa.org or 661-297-1600.

Sincerely,

Stephen L. Cole

Assistant General Manager
Santa Clarita Valley Water Agency