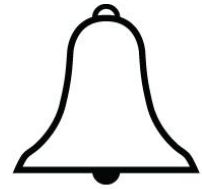


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Santa Margarita Water District

April 16, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812-0100

RE: Advanced Clean Fleets 15-Day Comment Period Response

Dear Chair Sanchez and Members of the Board:

On behalf of the Santa Margarita Water District (SMWD/District), we are writing to provide feedback regarding the proposed amendments to the Advanced Clean Fleet (ACF) regulations as made available on April 2, 2026. We'd like to thank the California Air Resources Board (CARB) members and staff for acknowledging the important work by public agencies in the regulation; however, these policies and amendments fall significantly short of protecting our communities, and, as currently drafted, will risk public health and safety.

SMWD proudly serves more than 200,000 residents with drinking water, recycled water, and wastewater services. We are environmental stewards, deeply committed to protecting natural resources and pragmatically pursuing strategies that reduce emissions while strengthening the long-term resilience and reliability of our water and wastewater systems. As a public, non-profit utility, our primary responsibility is protecting public health and safety by delivering reliable, high-quality services. Every dollar is directed toward essential operations, maintaining critical infrastructure, and meeting rigorous environmental and regulatory standards that safeguard our community.

Like many agencies, we face increasing challenges from aging infrastructure, evolving regulatory requirements, and the need to ensure system resilience in the face of climate impacts. We proactively manage these risks through investments in system reliability, emergency preparedness, water quality protection, and regional collaboration so that we can continue to provide safe, dependable service under all conditions.

It is this commitment that informs our comments. While we appreciate the proposed amendments, they continue to present significant operational and financial barriers for public agencies. For years, public agencies, including SMWD, have voiced our concerns about the ACF regulations, and the proposed amendments continue to pose significant risks to the health and safety of our communities. This includes unnecessarily limiting specific exemptions such as the Captive Biofuel Use exemption, which would now prohibit wastewater agencies from accessing due to ineligibility. The amendments also leave significant uncertainty, specifically in the area of the definition of “low-Nox ICE vehicle”. Without clarity, it is nearly impossible for public agencies to plan for implementation and plan for the actual impacts of the ACF regulations. In addition, the proposed changes appear to extend compliance responsibilities beyond fleet owners to include contracted fleets. Agencies, like SMWD frequently depend on contracted vehicle services to ensure operational continuity, respond to emergencies, perform specialized tasks, and manage periods of increased demand. If these contracted vehicles are required to meet ACF standards without sufficient flexibility, or if compliance requirements reduce the pool of available vendors, SMWD could encounter limited access to specialized equipment, slower response times, higher procurement costs, and reduced operational adaptability. These impacts could hinder the District’s ability to deliver timely services essential for protecting public health, maintaining regulatory compliance, and ensuring the reliability of critical utility operations.

More broadly, many of the updated exemptions remain constrained by narrow thresholds, limiting assumptions, and procedural hurdles. In practice, these limitations, combined with the lack of commercially available, operationally viable zero-emission vehicles for many use cases, create the appearance of flexibility without providing a workable path to compliance.

SMWD relies on highly specialized medium- and heavy-duty vehicles to respond to emergencies, maintain and restore service, and prevent disruptions. Recent events, including urban and wildfire response, water line breaks, and providing emergency, mutual aid to our neighboring agencies in order to prevent major sewer spills from reaching the ocean, have required our vehicles to respond immediately, travel long distances, and operate continuously for many hours and days uninterrupted. These operational realities, and the spirit of AB 1954, are not yet compatible with current zero-emission technologies.

At the same time, the infrastructure needed to support widespread electrification is not ready. Power upgrades can take years, and many heavy-duty, specialized vehicles are not yet available to meet the proposed operational requirements. Public agency fleets represent a small share of diesel emissions, estimated at less than 7%, yet the rule

requires local utilities to bear a disproportionate share of the costs associated with broader policy objectives.

It is essential that CARB does not discount the significance of the financial impact on public agencies and to the communities they serve. Public agencies cannot absorb the costs of rapid electrification. Even if the market ultimately delivers vehicles that satisfy public utility operational demands and ACF standards, achieving compliance will still be costly. Higher vehicle prices, the need for new infrastructure, a shrinking pool of contractors, and pricing pressures caused by limited supply will create considerable costs for public agencies, ultimately borne by the ratepayers responsible for funding critical water and wastewater services.

Because of the significant impacts of the proposed amendments that put the health and safety of our communities at risk, we respectfully but strongly request that CARB does not adopt the rules as proposed. It is critical that CARB issue an additional 15-day public comment period to allow for further stakeholder engagement and bring a revised proposal back to the Board for review and consideration prior to final adoption. Thank you for the opportunity to provide comments, and we look forward to reviewing future versions that reflect the importance of the critical services provided by public agencies.

Sincerely,



Robert Grantham
General Manager
Santa Margarita Water District