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April 16, 2026

Ms. Lauren Sanchez, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-0100

**RE: Inland Empire Utilities Agency Feedback on Proposed Amendments to the Advanced Clean Fleets Regulation**

Dear Chair Sanchez and Members of the Board:

On behalf of the Inland Empire Utilities Agency (IEUA) we are writing to provide feedback on the California Air Resources Board's (CARB) 15-day modified language for the Advanced Clean Fleets (ACF) regulation.

As a wholesale water supplier and regional wastewater treatment agency serving nearly one million residents in southwestern San Bernardino County, IEUA provides essential public services, including recycled water production, wastewater treatment, and groundwater recharge, that depend on the daily operation of a reliable and responsive heavy-duty fleet. IEUA previously urged CARB to delay implementation of public agency heavy-duty fleets and to revisit key elements of the regulation that do not reflect the operational realities of public utility service, including commercial availability, workable exemption pathways, infrastructure readiness, and the need to preserve mission-critical operational capacity.

While the 15-day modified language reflects that CARB has responded to concerns raised by public agencies and others by revising portions of the exemption and compliance framework, the proposal still does not adequately resolve the central issues previously raised by IEUA. Although the modified language adds and revises exemption pathways on paper, many of those pathways remain too narrow, too conditional, or too interdependent to provide realistic relief in practice for public utility fleets with specialized vehicles, intermittent but mission-critical operations, and infrastructure constraints. Several remain gated by threshold conditions, narrow assumptions, or procedural requirements that are unlikely to be available for fleets whose compliance challenges stem from the lack of commercially and operationally viable zero-emission alternatives. As a result, the proposal risks offering the appearance of flexibility without creating a realistic path to compliance for many public agencies in practice.

Beyond those broader concerns, IEUA is also concerned that the 15-day process has heightened uncertainty regarding CARB's interpretation of how the regulation may apply to contracted fleets and hired vehicle operations in a manner that could materially disrupt public utility service delivery. As currently understood, the regulation may impose compliance-related implications

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not only on covered fleet owners, but also on public agencies that hire and dispatch vehicles subject to the regulation. For agencies such as IEUA, this is a significant concern. Contracted vehicle support is often necessary to maintain continuity of service, address emergency conditions, perform specialized operational work, and respond to periods of elevated demand.

IEUA relies on contracted vehicle support when essential water and wastewater functions require specialized equipment, rapid response capability, or surge capacity beyond what can be maintained solely through in-house fleet resources. Those contracted services are critical to construction and capital projects, maintenance and repair work, biosolids and materials hauling, emergency response, and other specialized field operations. IEUA depends on that contracted support for incidents and activities including sanitary sewer spills and overflows, water main breaks, storm-related damage, power outages, hazardous materials response, work at lift stations, wells, basins, and flood control channels, night and weekend emergency repairs, regulatory compliance activities, CCTV inspections, confined space entry support, and heavy lifting operations. IEUA currently relies on nine contracted arrangements involving vehicle-supported operations, used on an as-needed basis, including routine maintenance support. If ACF compliance requirements are interpreted or applied in a manner that limits access to those contracted resources, IEUA could face reduced access to specialized equipment, delayed response times, increased procurement difficulty and cost, and diminished operational flexibility in circumstances where timely action is necessary to protect public health, maintain regulatory compliance, and preserve continuity of critical utility operations.

For these reasons, IEUA respectfully urges CARB to further revise and clarify the 15-day language so that the regulation is workable in practice for public utility fleets and does not impose compliance obligations that outpace vehicle availability, infrastructure readiness, and essential service needs. IEUA specifically requests that CARB make the following revisions or clarifications:

**1. Clarify the regulation's application to contracted vehicle operations.**

CARB should clearly state that public agencies are not rendered noncompliant because they rely on contracted vehicle support outside their ownership and procurement control, particularly for emergency response, specialized field services, construction support, regulatory compliance activities, and other essential utility operations.

**2. Revise exemption pathways so that they are workable in practice for public utility fleets.**

CARB should reconsider exemption criteria that remain gated by threshold requirements, numerical limitations, or procedural conditions that many public agencies cannot realistically satisfy where suitable zero-emission vehicles and supporting infrastructure are not yet available.

**3. Apply a real-world standard for commercial availability.**

For public utility compliance purposes, vehicle availability should mean more than a manufacturer listing, announcement, or theoretical offering. CARB should treat a vehicle as commercially available only where it is truly in production, can be procured within a reasonable timeframe, can be supported by the necessary infrastructure, and can reliably perform the required function under real-world operating conditions.

**4. Recognize the operational and financial impacts on essential public services.**

CARB should account for the operational, procurement, contractor, and ratepayer impacts that result when compliance obligations outpace vehicle availability, infrastructure readiness, or market capacity. Public agencies should not be placed in a position where preserving compliance requires reduced operational flexibility, diminished emergency responsiveness, or significant cost increases that ultimately fall on the ratepayers who fund essential water and wastewater services.

IEUA remains committed to working collaboratively with CARB on practical policies that advance environmental objectives while preserving essential public utility operations. At the same time, CARB's regulatory framework must be workable for public agencies charged with protecting public health and the environment every day, including during emergencies, infrastructure failures, and other conditions where operational flexibility is indispensable. Even if the market eventually produces vehicles capable of meeting public utility operational needs in line with ACF requirements, the cost of compliance will remain significant. Increased vehicle costs, supporting infrastructure investments, reduced contractor availability, and pricing pressures associated with constrained supply will impose substantial financial burdens on public agencies and, ultimately, on the ratepayers who bear the cost of maintaining essential water and wastewater services. Compliance should not come at the expense of service reliability, emergency response capability, environmental protection, or reasonable affordability for ratepayers.

Thank you for the opportunity to comment on this important regulatory language. IEUA respectfully urges CARB to revise the 15-day language accordingly and welcomes continued engagement with CARB staff regarding the practical implications of the proposed language for water and wastewater utilities and other agencies with critical public service obligations.

Sincerely,

INLAND EMPIRE UTILITIES AGENCY



Kevin L. Alexander, PE, ACE  
General Manager