

CALAVERAS COUNTY WATER DISTRICT

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June 16, 2026

Comment letter submitted via electronic commenting system

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

RE: Comment Letter – Advanced Clean Fleets Regulation Amendments/Additional 15-Day Changes

Dear California Air Resources Board,

The Calaveras County Water District (CCWD) is thankful for the opportunity to provide comments on the most recent 15-day change amendments to the Advanced Clean Fleets (ACF) regulation (15-day changes) as required by Assembly Bill 1594 (Garcia, 2023) [AB 1594]. CCWD is a rural water and wastewater district that serves approximately 30,000 customers across six public water systems and twelve public wastewater systems scattered throughout Calaveras County. Many of our customers are severely disadvantaged and in remote, geographically isolated communities. CCWDs medium and heavy-duty fleet consists of approximately seventy-five vehicles. It is common for the District's Medium and Heavy-Duty Fleet vehicles to travel hundreds of miles in a day to address issues across multiple disciplines to ensure the safe, reliable, wholesome, and efficient provision of water and wastewater services to our customers.

The comments provided below respond directly to the 15-day language changes to: (1) Convey concern related to the treatment of contracts regardless of length, and (2) Highlight that additional work must be completed and issues that must be resolved beyond these fifteen – day changes as these 15-day language changes have only made the ACF regulation more unworkable .

1. CCWD is concerned with the 15-day changes interpretation of contracted fleets and their inclusion in ACF compliance.

CCWD is in Calaveras County, a low population County, and therefore is not required to comply with the ACF Regulation until 2030. That said, the District is working to be thoughtful and proactive related to ZEV implementation and is finding it difficult to see what fleet applications will transition well to ZEVs for its operation. The 15 day changes addition of applying ACF compliance to all contract agreements regardless of length creates even more challenges.

The added contracted fleets requirement increases risk to public water and wastewater systems during emergencies. Within the context of ACF, it continues to diminish public water and wastewater organizations' abilities to provide safe, reliable, and cost-effective services.

CCWD has experienced multiple natural disasters since the inception of the AFC regulation. To ensure continued water and sewer services during emergencies like these, the District enlists the services of outside contractors to do work. Many of the vendors CCWD uses for contract services are local. When called, they know where to go and can get there quickly. This helps to minimize the effect of emergencies, like sewer spills, pumping water during wildfires, and water main breaks. Being forced to look elsewhere to find ACF compliant fleets for contract services will add needless exposure and risk to water and sewer districts.

This proposed change also runs counter to the original intent of AB 1594, which was to create greater flexibility for public agencies. Including contracted fleets in ACF compliance will effectively require CCWD to track vendor compliance relative to ACF. Moreover, it will force the District to end long-standing relationships for outside services with vendors who have intimate knowledge of the numerous District Facilities spread across a vast service territory simply because they are not ACF compliant.

Our Customers have a right to a safe, wholesome, and healthy supply of water. Adding the requirement that contracted fleets are subject to ACF when called upon to support water and wastewater district's during emergencies further erodes our District's ability to meet this right. Moreover, the addition of contracted fleets within the most recent 15-day changes presumes that CARB has the authority to impose the ACF regulation beyond public fleets. It is important to note that this change in how the ACF regulation is interpreted for private fleets occurred without input from the public or the CARBs Board of Directors.

CCWD respectfully requests the CARB reevaluate this aspect of the regulation. The Association of California Water Agencies (ACWA) provided constructive options that could resolve this issue.

Including:

- Define “major contracts” and “short-term contracts” in 15-day changes clearly to avoid ambiguity
 - Specify that “short term contracts” identified to deal with emergencies are not part of ACF compliance, and “short term contracts” are those that last less than 12 months.
 - Hold off on enforcement of contracts and rentals as part of ACF compliance until further dialogue is held to appropriately administer rentals.
- Develop an additional guidance document that separates major contracts from short term contracts and work with public agencies on case-by-case scenarios.
- Prioritize how to appropriately identify short term contracts in future amendment discussions, after this amendment process (2025-26) is closed.
- Repeal the current June 1, 2026, second 15-day rulemaking draft and return to the previous changes from the initial 15-day draft, dated April 2, 2026, as a starting point.

2. Significant work remains when it comes to ACF implementation

Challenges remain unresolved within the ACF regulation, and these 15-day changes do not resolve them. Public water and wastewater utilities are no closer to ensuring harmony between the safe, reliable provision of essential water / sewer services and the emissions reductions the ACF intends to effect, then they were before the signing of AB 1594. Safe water cannot continue to be compromised to meet the objectives of the ACF regulation. The latest round of 15-day changes is absent of any solutions in this regard.

Considering the lack of market availability of ZEVs and the significant lift the State’s energy providers must undergo to ensure adequate energy for ZEV charging stations, the administrative close of this proceeding does not mean the end of the issues associated with the ACF regulation. CCWD encourages the CARB continue to work with representative associations like the Association of California Water Agencies (ACWA), the California Association of Sanitation Agencies (CASA), and the Mountain Counties Water Resources Association (MCWRA) to improve upon the regulation and resolve ongoing challenges. CCWD encourages the CARB to take up a new amendment process to address broad issues like:

- ZEV Market Uncertainty
- ZEV Market Affordability
- Grid Reliability

And specific Issues within ACF language like-

- Fleet owner definition rental and lease language
- Early or Excess ZEV Purchases
- Fleet Resilience Exemption capped at 25% of fleet and subtracted by other exemptions
- Increased Requirements to apply for ZEV Purchase and Daily Usage Exemptions
- Future Mobile Fueling Requirements to be reviewed for use in 2030
- Hiring Compliant Fleets

In conclusion,

The Calaveras County Water District appreciates the work the CARB staff have done and are doing to work to improve air quality in California. In consideration of the Advanced Clean Fleets Regulation, CARB staff have worked to understand the District's unique challenges, vast service territory, and the critical importance of ensuring safe, wholesome, healthy, efficient, and reliable water and wastewater services in all capacities. With the support of ACWA, they even came into the field and toured CCWD facilities. The result of the CARB Staff's effort to understand what ACF compliance looks like led to many of the amendments the CARB developed in consideration of AB 1594 that are helpful to water and wastewater utilities. These include:

- Postponing compliance for low-population Counties until 2030.
- Extending the 50/50 purchase allowance for compliant Agencies
- Providing exemptions
 - Daily Usage
 - Purchase
 - Fleet resilience

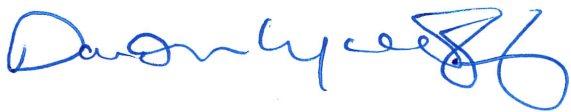
CCWD appreciates CARB staff's willingness to provide amendments that allow for water and wastewater districts to develop pathways for ACF compliance without impacting critical water and wastewater operations. As the amendment process continued, however, it was clear that 15-day changes worked to make amendments more restrictive. The fleet resilience exemption for example, is limited to only 25% of the medium and heavy-duty fleet. Additional exemptions eat-away at the 25%

resilience exemption. So, at the end of the day, if an organization receives a daily usage exemption for 10% of its fleet because comparable Zero Emission Vehicles (ZEVs) don't exist, they can only achieve 15% of the fleet resilience exemption. Reflecting on the LA wildfires, emergencies and disasters often encompass entire regions. All vehicles are called to serve in regional emergencies. This exemption needs to retain the utmost flexibility as ZEVs that can meet minimum service requirements in emergencies do not exist.

CCWD highlights these facts to impress upon the CARB that adding language related to contracted fleets in this most recent batch of 15-day changes only works to make the ACF more unworkable. CCWD respectfully requests the CARB to refrain from this method of tightening oversight in the absence of discourse during this most recent round of 15-day changes.

We appreciate their efforts to better understand CCWD immensely. As staff work to implement the ACF, they must understand their work cannot erode water and wastewater services in any capacity. Water / wastewater supply and clean air cannot conflict with one another. It is from this lens that CCWD, and the rest of the water and wastewater community sees the ACF and this current round of 15 day changes.

Sincerely,



Damon Wyckoff

Director of Operations

The Calaveras County Water District

cc:

The Honorable Lauren Sanchez, Chair, CARB

The Honorable Lynda Hopkins, Board Member, CARB

The Honorable Eric Guerra, Board Member, CARB

The Honorable Patricia Lock Dawson, Board Member, CARB

The Honorable Dr. Tania Pacheco-Warner, Board Member, CARB

The Honorable Dr. Susan Shaheen, Board Member, CARB

The Honorable Dr. John Balmes, Board Member, CARB

The Honorable Cliff Rechtschaffen, Board Member, CARB

The Honorable John Eisenhut, Board Member, CARB

The Honorable Dr. Steve Cliff, Executive Director, CARB

Ms. Michelle Buffington, Division Chief, CARB

Mr. Tony Brasil, Branch Chief, CARB

Mr. Paul Arneja, Manager, CARB

Mr. Chris Francheschi, Manager, CARB

Mr. Nick Blair, ACWA