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June 16, 2026

ELECTRONIC MAIL

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBJECT: ADVANCED CLEAN FLEETS 2ND 15-DAY COMMENT PERIOD RESPONSE

Chair Lauren Sanchez and Members of the California Air Resources Board:

On behalf of Elsinore Valley Municipal Water District (EVMWD), we appreciate the opportunity to comment on the California Air Resource Board's (CARB's) second 15-day notice of modifications to the Advanced Clean Fleets (ACF) regulations. EVMWD is a public, nonprofit water agency that provides water, wastewater, and recycled water services across its service area, which spans 96 square miles and includes the cities of Lake Elsinore, Canyon Lake, and Wildomar, as well as parts of Murrieta and unincorporated areas of Riverside County. EVMWD currently serves approximately 164,000 residents in western Riverside County. While EVMWD supports reasonable efforts to reduce emissions and advance cleaner vehicle technologies, we are concerned that the current proposal raises significant legal, operational, and procedural issues for local agencies.

While we recognize the state's policy direction toward zero-emission technologies and are actively working to integrate zero-emission vehicles into our fleet, we remain concerned that the proposed second 15-day rule does not fully address the operational constraints and service reliability requirements faced by public water and wastewater agencies.

First, EVMWD is deeply concerned with the proposed requirement that vehicles operated by contractors be treated as part of a public agency's fleet for compliance purposes. Contracted vendors should not be considered part of a district's fleet merely because they are used to support district operations. At a minimum, CARB should clarify the scope of this requirement so that it does not include contractor-owned or contractor-operated vehicles that are outside of direct agency control.

The proposed changes are substantive, not merely clarifying, because they expand compliance obligations and materially alter how agencies must evaluate fleet status and contract relationships. For that reason, the modifications warrant a full 45-day comment

period rather than a 15-day process to ensure affected agencies have a meaningful opportunity to review the impacts and provide informed feedback.

In addition, EVMWD is concerned that the proposal could create unnecessary administrative and legal burdens on public agencies by requiring ongoing monitoring of contractor vehicle fleets, contract status, and related compliance documentation. These requirements would place agencies in the position of overseeing vendors' vehicle composition and compliance obligations despite having no direct ownership or operational control over these vehicles. As a result, the proposal would create unnecessary complexity, increase compliance risk, and divert staff resources away from core public service responsibilities.

For these reasons, EVMWD respectfully requests that CARB either remove the contractor-vehicle provisions from the proposed amendments or revise them to make clear that vehicles under contract are not treated as part of a public agency's fleet for ACF compliance purposes. We also request that CARB extend the comment period to 45 days to allow for adequate review of these substantive changes.

Thank you for your consideration of these comments. Please contact Erin Sasse, Director of Government Relations, at esasse@evmwd.net or 951-674-3146 Ext. 8229 if you have any questions.

Sincerely,



Greg Thomas
General Manager

ES:mg