Placer County Water Agency (Anthony Firenzi)

Chair Sanchez and Members of the California Air Resources Board:
On behalf of the Placer County Water Agency (PCWA), we appreciate the opportunity to comment on the second 15-day proposed amendments to the Advanced Clean Fleets (ACF) Regulation.
Placer County Water Agency serves a region spanning 1,500 square miles. We serve drinking water to a population of about a quarter million people and agricultural water to thousands of acres of land along a 170-mile-long canal system. Most pertinent to the proposed regulations, PCWA operates a hydropower system in the headwaters of the American River watershed. This hydropower system begins with large dams and powerhouses near the summit of the Sierra but is operated out of headquarters in Auburn and Foresthill. Both our canal system and our hydropower system necessitate hours of driving with duty trucks, and thousands of feet in elevation gain for the hydropower system. These trips are necessary in all seasons, including dangerously hot and cold temperatures.
In our April 15, 2026, comment letter, PCWA requested that our utility vehicles be categorically exempted from the regulations the same manner as those found in part (c) of §2013 of title 13 of the California code of regulations. In addition, we requested a firm commitment from CARB to reevaluate the ACF regulation through a public process before 2030. A scheduled reevaluation would allow the Board and staff to assess whether the regulation accurately reflects real-world Zero Emissions Vehicle (ZEV) market conditions. These concerns remain unresolved.
Unfortunately, the second 15-day amendments move the regulation further away from a workable framework. Rather than addressing longstanding concerns raised by local governments, water agencies, and other essential service providers, the latest amendments introduce significant new requirements that expand the scope of the regulation in ways that were neither contemplated in the original proposal nor adequately vetted through the public process.
Expansion of "Fleet Owner" Definition and Inclusion of Contracted Services
PCWA is concerned with the revised definition of "fleet owner" and related provisions that extend compliance obligations to vehicles associated with contracted services and entities performing work on behalf of public agencies.
By including vehicles operated under contracts, and contracted services utilizing vehicles, CARB has introduced a substantial policy change that reaches far beyond the direct ownership and operation of public agency fleets. This change effectively extends regulatory obligations to contractors, vendors, consultants, construction firms, emergency service providers, and other entities that support essential public services.
Contracted services are not optional for PCWA to fulfill its public service. We routinely rely on outside contractors to perform:
• Emergency pipeline and infrastructure repairs
• Vegetation management and fuel reduction projects
• Specialized maintenance and construction services
• Emergency response and disaster recovery activities
• Delivery of chemicals and other supplies
• Routine services like landscaping and equipment maintenance
Many of these services require specialized vehicles and equipment that are not currently available in zero-emission configurations suitable for rugged terrain, remote locations, or emergency response conditions.
The practical effect of the proposed amendments is to hold public agencies responsible for the compliance status of vehicles over which they have little or no operational control. This creates

significant uncertainty for existing service agreements and future procurements and may discourage contractors from bidding on critical public works and emergency response projects.

In addition, the amendments create new questions regarding reporting, compliance verification, and potential enforcement responsibilities. Public agencies should not be placed in the position of tracking contractor fleet compliance, collecting and maintaining compliance records, or assuming liability for vehicles they do not own, operate, or control. These new administrative burdens and compliance obligations have not been adequately analyzed and represent a significant departure from the original scope of the regulation.

Significant New Regulatory Language Cannot Be Adopted Through a 15-Day Process

PCWA is equally concerned with the procedural implications of these amendments.

The inclusion of contracted vehicles and services utilizing vehicles represents a significant expansion in regulatory scope that affects an entirely new class of stakeholders. Contractors, vendors, service providers, equipment operators, and construction firms that were not previously understood to be directly regulated by these provisions now face potentially substantial compliance obligations and business impacts.

These stakeholders deserve a meaningful opportunity to review, analyze, and comment on the proposal.

The purpose of the 15-day review process is to provide public review of modifications that are sufficiently related to the original proposal. It is not intended to serve as the vehicle for introducing significant new regulatory concepts that materially expand the scope of regulated entities.

PCWA believes the latest amendments raise substantial questions regarding whether affected stakeholders have received adequate notice and opportunity for comment. At a minimum, the changes warrant a broader stakeholder engagement process and additional opportunities for public review.

Request for Additional Review and Stakeholder Engagement

Given both the unresolved concerns identified in the previous comment period and the significant new issues introduced through the second 15-day amendments, PCWA respectfully request that you return to the first version of 15-day language to not include "contracting vehicles or services using vehicles," amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most, and that you evaluate the ZEV market conditions ahead of the due date for compliance.

PLACER COUNTY WATER AGENCY
SINCE 1957

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California Air Resources Board
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Sacramento, CA 95814

SUBJECT: Advanced Clean Fleets (ACF) – Second 15-Day Proposed Amendments (released June 1, 2026)

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Sincerely,

PLACER COUNTY WATER AGENCY

Anthony L. Firenzi, PE
Director of Strategic Affairs

cc: PCWA Board of Directors and General Manager