



ITEM: Comment Letter – Advanced Clean Fleets (ACF) ZEV Flexibility

PRESENTED BY: Michiko Mares

TYPE of ITEM: ACTION

TYPE of ACTION: Consent Calendar- General Vote

BOARD POLICY: 1055 – Legislative Advocacy

Recommendation

Authorize the General Manager to submit a comment letter to the California Air Resources Board (CARB) requesting additional flexibility and emergency vehicle exemptions under the Advanced Clean Fleets (ACF) regulation

Discussion

The California Air Resources Board (CARB) has adopted the Advanced Clean Fleets (ACF) regulation, which requires state and local agencies to transition medium- and heavy-duty fleets to zero-emission vehicles (ZEVs) on an accelerated timeline. While the District supports California’s climate and emissions reduction goals, significant operational and infrastructure challenges remain for public agencies responsible for critical services.

Recent advocacy efforts led by the California Special Districts Association and partner organizations highlight the need for additional flexibility to ensure local agencies can comply with ACF requirements without compromising public safety or service reliability. These efforts emphasize that many agencies, particularly those providing essential services, face limitations including:

- Lack of sufficient charging or fueling infrastructure
- Limited availability of ZEVs capable of performing specialized utility functions
- Operational constraints during emergencies and disaster response
- Financial impacts associated with premature fleet replacement

Of particular concern to the District is the need for clear and expanded exemptions for vehicles used in emergency response and critical infrastructure operations. As a public water agency, HBMWD relies on fleet vehicles to maintain water delivery, respond to system failures, and support emergency operations during wildfires, storms, earthquakes, and other disasters. These

conditions often require vehicles capable of extended operation, off-road access, and rapid deployment that current ZEV technology may not yet support.

The proposed comment letter, based on CSDA's ZEV flexibility initiative, requests CARB to amend the ACF regulation to:

- Expand categorical exemptions for vehicles that support emergency response and essential utility operations
- Provide additional compliance flexibility where infrastructure or vehicle availability is not yet feasible
- Ensure local agencies can continue to protect public health and safety while transitioning fleets over time

Submitting this letter will align HBMWD with statewide advocacy efforts representing local agencies and help ensure the District's operational needs are considered in future regulatory updates.

Alternatives

1. Do not authorize the General Manager to sign the letter of support.
2. Provide alternative direction to staff regarding the District's position.

Fiscal Analysis

N/A

Environmental Requirements

Not Applicable.

Exhibits/Attachments

- Attachment 1 – - Draft Comment Letter to CARB – ACF ZEV Flexibilit

