



**Date:** September 15, 2025

**Chair Liane Randolph**  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Concerns Regarding Advanced Clean Fleets (ACF) Regulations**

Dear Chair Randolph and Members of the Board:

On behalf of the Santa Fe Irrigation District, a special district providing critical water services to the communities of Rancho Santa Fe, Fairbanks Ranch, and Solana Beach, we are writing to express concerns regarding the implementation and impacts of the Advanced Clean Fleets (ACF) regulations adopted by the California Air Resources Board (CARB).

Our district has long been committed to environmental stewardship, investing in energy-efficient infrastructure and integrating sustainability into our operations. However, as a public agency with unique operational and service reliability requirements, we have significant concerns about the pace, cost, and practical challenges of complying with the ACF regulation.

## **1. Operational Reliability and Emergency Response**

Our small fleet comprises specialized vehicles that are essential for emergency response, water system maintenance, and delivering critical services during wildfires, earthquakes, and other natural disasters. Many of these vehicles operate in rural environments where ZEV options are currently limited or not available. Battery-electric or hydrogen-powered vehicles have not yet demonstrated the reliability, range, or durability needed for such demanding roles.

### **Wildfire Risk**

In recent years, California has experienced devastating wildfire seasons that have placed immense demands on public utility vehicle fleets—especially those involved in emergency response and utility restoration. Many of these vehicles operate in remote, high-risk areas where electric charging infrastructure is still limited or non-existent. The reliability, range, and refueling speed

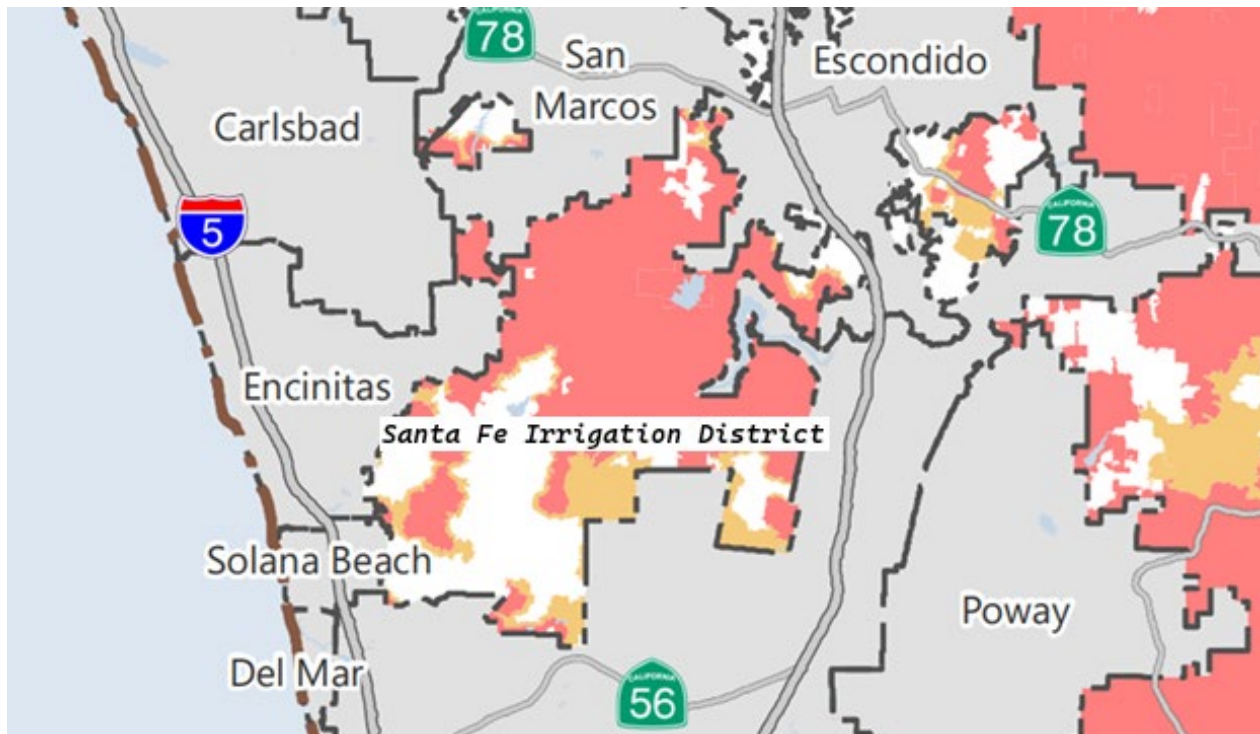
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of traditional combustion-powered vehicles continue to play a critical role in responding to these crises. More than half of the District's service area is considered "very high" and "high" fire hazard severity zones. Wildfire risk is a strong concern for the District and the communities we service. Allowing exemptions for emergency response fleets, utility crews, and essential service providers operating in wildfire-prone regions in our view is key to enabling the most efficient, hardened and full proof method for responding to emergencies.

### **County of San Diego Fire Hazard Severity Zone Map**



*Source: [www.sandiegocounty.gov/content/dam/sdc/sustainability/docs/CAP-Update-SGA-Map-Fire-Hazard-Zones.pdf](http://www.sandiegocounty.gov/content/dam/sdc/sustainability/docs/CAP-Update-SGA-Map-Fire-Hazard-Zones.pdf)*

In 2003, the Cedar Fire, the largest wildfire in California history at that time, consumed over 270,000 acres and destroyed nearly 3,000 structures in San Diego County, directly impacting the District's service territory. The 2007 Witch Creek fire also consumed portions of the service area, destroyed structures, and threatened SFID infrastructure. SFID's emergency response, which involved hours of fleet and equipment operations, played a crucial role in combating these fires. The District's operational response and coordination with local agencies kept the distribution system strong while fire crews battled the blazes.

Water agency fleets must be able to rely upon their vehicles and equipment during emergency response efforts. Essential public agency utilities are charged with maintaining operations even during emergencies and are often involved in mutual aid efforts, as seen during the 2025 Palisades and Eaton Fire. The 2025 LA events provide us with a recent example of the crucial role water

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utilities like SFID play in local emergency response efforts. In addition to the 2003 Cedar Fire and 2007 Witch Creek Fire, our agency has responded to several other notable events such as the 2014 Cocos, Poinsettia and Bernardo Fires which consumed over 26,000 acres of land and destroyed 65 structures.

Worst-case scenario events (where public agency utility fleets must respond rapidly, for extended periods of time, who are subject to San Diego Gas and Electric Public Safety Power Shutoffs and lack the necessary charging infrastructure) must be considered, and flexibility needs to be an essential component of the ACF rule to ensure successful emergency response. Utilities like the Santa Fe Irrigation District must have operational flexibility to respond, repair, and maintain water service and supply to its region, to prevent loss of life and property.

## **2. Infrastructure and Charging Constraints**

The lack of sufficient charging infrastructure presents a significant barrier. Retrofitting our facilities to accommodate fleet-wide electrification will require substantial capital investments, space, and time — none of which are readily available. Moreover, costs, grid reliability, power supply limitations, and utility coordination issues further complicate our ability to meet the required transition timelines. Public Safety Power Shutoffs in the region have become routine during high fire risk conditions, sometimes for extended periods, directly impacting the reliability of the power grid. This directly impacts SFID's charging capabilities jeopardizing operational readiness and emergency response.

## **3. Cost Implications**

The financial burden associated with fleet replacement, infrastructure upgrades, and long-term maintenance under the ACF mandate is substantial. As a special district, our revenues are limited and primarily derived from ratepayers who expect affordable and reliable service. Without dedicated state or federal funding, unfunded mandates like ACF place disproportionate strain on agencies and their constituents.

Additionally, SFID ratepayers expect the District to procure the lowest-cost option available. ZEV medium and heavy-duty vehicles are 2-3 times the cost of their conventionally fueled counterparts. Although incentives are generally designed to bring ZEVs into price parity with conventional vehicles, it is reasonable to assume the up-front costs are more likely higher for ZEVs than lower as compared to conventional trucks. This is a significant cost difference and will ultimately impact water rates and the cost of living across the entire State of California.

## **4. Request for Flexibility and Exemptions**

We respectfully urge CARB to consider the following recommendations:

- **Exempt or extend compliance deadlines** for special districts with essential public safety and utility responsibilities.

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- **Allow greater flexibility** in the form of extended transitional timelines, fleet-specific waivers, and delayed enforcement.
- **Develop and fund grant programs** targeted explicitly at water and wastewater utilities to assist in fleet electrification efforts.
- **Engage directly with special districts** during implementation phases to ensure that real-world challenges are accounted for in regulatory guidance.

We appreciate CARB's leadership in advancing environmental goals and acknowledging the urgency of climate action. However, we firmly believe that the successful implementation of the ACF regulation requires a collaborative approach that accommodates the operational realities of essential public service providers, such as the Santa Fe Irrigation District.

Thank you for your consideration. We would welcome the opportunity to meet with your staff to discuss our concerns and identify workable solutions that align with both environmental objectives and the continued delivery of safe, reliable water services to our community.

Sincerely,

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