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September 11, 2025
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to Advanced Clean Fleet Regulations – Public Comment

Dear Chair Randolph and Members of the Board:

Olivenhain Municipal Water District (OMWD) appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleet Regulations. OMWD provides 87,000 northern San Diego County customers with water, wastewater, recycled water, hydroelectric, and recreational services across a 48-square-mile service territory.

While we stand with CARB in seeking to reduce emissions, we have a duty to uphold public safety, which requires a reliable fleet. For this reason, we are requesting that any vehicle used for Mutual Aid or emergency response purposes be exempt from the proposed regulations such as those listed under California Vehicle Code section 165. We need to rely on these emergency response vehicles 24/7, even when power is out during red flag or fire emergency events. If our vehicles are not reliable, neither is our water service to fight fires and sustain life.

Well drafted exemptions are also vital to avoid imposing disproportionate burdens on smaller or financially limited water agencies that lack the capacity to acquire additional electric vehicles solely to satisfy qualification criteria. OMWD respectfully urges CARB to recognize the vital role that water district personnel play in safeguarding public health and safety, and to establish a clear (mutual aide/emergency response) exemption that:

- Applies regardless of the percent of EV purchases an Agency has made.
- Acknowledges that current EV technology cannot yet meet the demands of rugged, all-hour and extended duration emergency operations.
- Protects small and rural districts from financial burdens that would otherwise leave communities without reliable water support.



1966 Olivenhain Road • Encinitas, CA 92024 • 760-753-6466 • www.olivenhain.com

A Public Agency Providing Water Wastewater Services Recycled Water Hydroelectricity Elfin Forest Recreational Reserve



- Recognizes pre-profit OEMs do not have national parts and service networks or ample, trained technicians to diagnose and repair power electronics and drive-train systems unique to ZEVs.
- Adds an automatic “Lemon” exemption – granting exemption from ZEV procurement requirements when a ZEV is considered substantially impaired and allows the public agency to replace the ZEV with a comparable internal combustion engine vehicle.

Our local fire departments that rely on us have sent letters supporting this position (attached).

Balancing climate goals with public safety is critical. If you have any questions or need more information, please feel free to contact me at 760-753-6466 or kthorner@olivenhain.com.

Sincerely,



Kimberly A. Thorner
General Manager



Rancho Santa Fe Fire Protection District

P.O. Box 410 • 18027 Calle Ambiente • Rancho Santa Fe • California 92067-0410
Tel. (858) 756-5971 • Fax (858) 756-4799

Board of Directors
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Fire Chief
Dave McQuead

September 5, 2025
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: California Air Resources Board: Advanced Clean Fleets Regulations: Mutual Aid and Emergency Response Exemption for Water District Vehicles - SUPPORT

Dear Chair Randolph and Members of the Board:

As a Fire Chief that serves areas immediately adjacent to and overlapping Olivenhain Municipal Water District (OMWD) service areas, I strongly support amending California Air Resources Board's (CARB) proposed Advanced Clean Fleets regulations to exempt critical water district vehicles from the zero-emission vehicle purchase requirements. Fire Department personnel work in close coordination with OMWD during emergencies to ensure water availability and system dependability across OMWD's 48-square-mile service territory. Furthermore, an exemption will ensure the effectiveness of Mutual Aid and emergency response operations.

It is vital that CARB recognize emergency operations require immediate readiness, and water district vehicles are essential in fire suppression, natural disaster response, and public utility emergencies such as water main breaks and power outages. In such circumstances, gas-powered vehicles offer immediate readiness and operational flexibility that current zero-emission alternatives cannot replicate.

I urge CARB to adopt or amend exemptions that consider the following:

- Acknowledges ICE vehicles that have ever been used or could be used in emergencies to be automatically exempt. Just as those listed under California Vehicle Code 165.
- Acknowledges that current EV technology cannot yet meet the demands of rugged, all-hour emergency operations.
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Balancing climate goals with public safety is critical. A clear exemption for water district emergency response vehicles ensures that California remains prepared for disasters while the state continues its clean fleet transition. If you have questions or need more information, please feel free to contact me at 858-756-5971 or mcquead@rsf-fire.org.

Regards,

Dave McQuead
Rancho Santa Fe Fire Protection District, Fire Chief



*City of
Encinitas*

September 11, 2025
California Air Resources Board
1001 I Street
Sacramento, CA 95814

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Regards,

Josh Gordon
City of Encinitas, Fire Chief