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September 10, 2025

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

**Subject: Comment Letter – Public Hearing to Consider Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations**

Dear Chair Randolph and Members of the Board:

On behalf of the Vallecitos Water District, thank you for the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard regulations.

Vallecitos Water District strongly supports the California Air Resources Board's (CARB) leadership in advancing policies that reduce greenhouse gas emissions and improve air quality across our state. We share CARB's vision of a cleaner and healthier future for all Californians. At the same time, we have a statutory and moral responsibility to uphold public safety, which depends on maintaining a reliable and immediately available fleet.

For this reason, we respectfully urge CARB to ensure that any vehicle used for Mutual Aid or emergency response purposes is exempt from zero-emission vehicle (ZEV) purchase requirements, regardless of prior ZEV acquisitions by the agency. Emergency operations demand certainty and readiness at all times. Water and wastewater agencies like Vallecitos play a critical role in wildfire suppression, natural disaster response, and utility emergencies, such as water main breaks, sewer overflows, and widespread power outages. In such circumstances, operational flexibility and reliability are paramount.

At present, conventional gas and diesel-powered vehicles provide a level of immediate readiness and adaptability that ZEVs are not yet able to replicate, especially when emergencies extend into remote or prolonged operations where charging infrastructure is limited or unavailable. Ensuring an exemption for emergency and Mutual Aid vehicles will safeguard the ability of essential service providers to protect the public under all conditions.

Additionally, this exemption is vital to avoid placing a disproportionate burden on smaller or financially constrained public agencies and special districts that may not have the resources to purchase additional ZEVs solely to meet regulatory thresholds. By allowing this targeted exemption, CARB can balance California's critical emission-reduction goals with the equally critical need for public safety and emergency reliability.

Furthermore, as currently drafted, the "mutual aid" exemption applies only to vehicles "dispatched under contract" to aid another entity. This definition is too narrow and does not reflect the operational realities of public utilities. Water, sewer, and electric utilities maintain fleets that must be rapidly deployed in emergencies to restore essential services and protect public health and safety. These vehicles may not fall under a formal "mutual aid" contract yet are nevertheless vital to community resilience. We urge CARB to rework this exemption to explicitly apply to fleets owned by utilities, including water, wastewater, and electricity providers.

Finally, the current definition of "Declared Emergency" is also too limited. As drafted, only the federal government, Governor, local or county officials can make such declarations, and only for certain large-scale events. In practice, utilities routinely face emergencies such as water main breaks, sewer spills, or electrical outages that require immediate fleet deployment to prevent or mitigate risks to public health and safety. These situations may never rise to the level of a county- or state-declared emergency, yet they are no less urgent. We strongly recommend expanding the definition of "Declared Emergency" to include interruptions to water, wastewater, and electricity services where fleet deployment is required to protect or restore public health and safety.

Every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes, as affirmed in California Water Code Section 106.3 through Assembly Bill 685 (2012). Upholding this right requires that water agencies maintain the ability to respond rapidly to emergencies and protect public health. We sincerely thank CARB for its leadership in advancing clean transportation and urge you to incorporate this exemption into the final regulations to ensure that environmental progress does not come at the expense of community safety. Vallecitos Water District is committed to partnering with the state to achieve our shared environmental goals while safeguarding the resilience and well-being of the communities we serve.

Sincerely,



P.P. James H. Gumpel, P.E.  
General Manager  
Vallecitos Water District