



TAMALPAIS COMMUNITY SERVICES DISTRICT

305 Bell Lane, Mill Valley, CA 94941 ♦ 415.388.6393 ♦ Fax: 415.388.4168
info@tamcsd.org ♦ www.tamcsd.org

Submitted to the California Air Resource Board:
<https://carb.commentinput.com/?id=HBtS485cF>

April 16, 2026

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

RE: **ADVANCED CLEAN FLEETS 15-DAY COMMENT PERIOD RESPONSE**

Chair Lauren Sanchez and Members of the California Air Resources Board:

On behalf of the Tamalpais Community Services District (TCSD), we appreciate the time and effort that has gone into the development of the 15-day comment draft. While we support the State's climate and emissions reduction goals, we must emphasize that, without appropriate exemptions, we cannot safely and reliably serve our community during emergencies.

TCSD serves approximately 7,500 residents in the unincorporated Tam Valley area of Marin County. The District provides wastewater collection, solid waste collection, and parks and recreation services. We maintain approximately 30 miles of sewer mainline and operate four (4) pump stations within our collection system.

During emergency conditions, TCSD must rely on specialized vehicles capable of accessing sewer infrastructure located on steep, narrow, and, in some cases, unpaved roads—often under adverse weather conditions. These response efforts may require vehicles to remain in service for extended periods, frequently exceeding eight hours. Furthermore, there are currently no commercially viable zero-emission vehicle (ZEV) replacements available for many specialized sewer maintenance vehicles.

For example, a hydrovac truck used to clear a blocked sewer line may need to return to the corporation yard to discharge collected material and immediately redeploy to continue operations. Any delay caused by required vehicle charging could significantly impede response time and increase the risk of a sanitary sewer overflow, potentially resulting in serious environmental impacts to nearby waterways.

To prevent unnecessary risks to public health, property, and the environment, we respectfully urge the Board to reconsider the amendments outlined in the October 7 letter submitted by the California Special Districts Association, League of California Cities, and California State

Association of Counties, collectively representing over 5,000 local agencies and 40 million Californians.

Local agencies like TCSD remain committed to supporting the State's climate goals. However, the current Advanced Clean Fleets (ACF) mandates present significant operational challenges, particularly with respect to maintaining critical services during emergencies and disaster response.

We respectfully request that the ACF regulations be amended to categorically exempt vehicles that respond to, assist in, and recover from emergencies and disasters, consistent with the exemptions outlined in Section 2013(c) of Title 13 of the California Code of Regulations. This should include, but not be limited to, *water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention and protection vehicles, search and rescue vehicles, and disease and vector control vehicles.*

Ensuring these vehicles remain operationally viable is essential to protecting the communities we serve, particularly during times of crisis.

Thank you for your consideration.

Sincerely,



Garrett Toy
General Manager
Tamalpais Community Services District