2100 OLSEN ROAD, THOUSAND OAKS, CA 91360 • (805) 526-9323 • CALLEGUAS.COM

April 17, 2026

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

RE: Advanced Clean Fleets (ACF) 15-Day Comment Period Response

Dear Chair Sanchez and Members of the California Air Resources Board (CARB):

Calleguas Municipal Water District (Calleguas) provides essential water supply and emergency response services to 650,000 residents through 19 purveyors across a 366-square mile region spanning from the Los Angeles County line at Chatsworth to the Pacific Coast at Oxnard in Ventura County. Due to the unique operational environment, emergency responsibilities, and varied terrain of the Calleguas service area, compliance with CARB's proposed ACF electric vehicle (EV) fleet requirements presents significant barriers that will compromise the District's ability to respond to critical public health emergencies. We respectfully request your consideration of our input.

As a critical water utility, Calleguas has a mandated obligation to ensure water reliability, water quality, water pressure and rapid emergency restoration of service. Therefore, any requirement that limits the District's mobility or responsiveness presents a direct public health risk. Maintaining a flexible gas or diesel-powered emergency fleet is essential until technology evolves to meet the reliability and heavy-duty demands unique to the District.

Calleguas operates facilities across rugged mountainous and inaccessible terrain, including remote reservoirs, pump stations, and pipeline alignments. These locations:

- Often lack grid power or EV charging infrastructure
- Require long travel distances over steep grades and unpaved access roads
- Experience extreme conditions (heat, dust, slope) that significantly degrade EV performance and usable range
- Demand vehicles with high torque, long duty cycles, and reliability far from support facilities

In remote environments with no ability to charge, EV mandates would endanger the District's ability to complete inspections, repairs, and emergency maintenance in a timely manner and could leave employees stranded in remote locations especially during emergencies such as a fire. EV fleet requirements assume predictable routing and proximity to charging infrastructure—conditions incompatible with Calleguas' real-world operational needs. Furthermore, emergency deployments often occur at opposite ends of the service area with no opportunity to return to a central charging hub.

During major system failures, pipeline ruptures, power outages, or natural disasters, response crews must be deployed immediately and without operational constraints. These crews often:

- Mobilize at unpredictable hours
- Travel across long distances with no time for vehicle charging
- Operate in locations lacking electrical infrastructure needed to support EV charging
- Require vehicles that can remain in continuous operation for extended periods when public safety is at risk

EVs currently do not offer the range, rapid refueling, and 24-hour availability required to ensure uninterrupted emergency response. Delays caused by charging or reduced range in remote deployments could result in prolonged water outages, water quality risks, public health impacts, and safety risks to staff.

Calleguas has invested millions of dollars in emergency preparedness investments, including large mobile emergency generators to maintain pumping operations during electrical outages or wildfire-related- public safety power shutoff events. These generators are heavy and require specialized towing capabilities provided by gas or diesel-powered fleet trucks.

Electric vehicles currently on the market face critical limitations:

- Insufficient towing capacity for multi-ton generators and trailers hauling equipment
- Severe range reduction when towing, exacerbated by inclined roads, off-road terrain, and long-distance travel requirements
- Lack of charging infrastructure at key remote sites where generators, tractors and other equipment are needed
- Inability to safely operate under continuous heavy-duty hauling conditions during extended emergency events and during extreme events

Until EV technology can reliably support heavy equipment emergency towing without operational compromises, requiring EV fleet compliance would directly hinder the District's ability to keep water flowing during large-scale outages and to offer mutual aid to public agencies during emergency events.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the October 7 letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively

representing our state's 5,000 local agencies and 40 million residents. Water utility vehicles need to be categorically exempted from the regulations in the same manner as those found in part (c) of §2013 of Title 13 of the California Code of Regulations, which include those vehicles that respond to, assist in, and recover from disasters and emergencies

We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most.

Thank you for your consideration.

Sincerely,

Ian Prichard
Deputy General Manager