

Santa Fe Irrigation District



April 17, 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 Board:

Santa Fe Irrigation District (SFID) appreciates the opportunity to provide comments on the 15-day comment draft. We recognize that significant time and effort have gone into revisions to the proposed regulations that were developed in response to previous concerns stated by public agencies and associations. However, as a critical component of community safety, we cannot serve our communities during times of emergencies unless water utility vehicles are exempted from the proposed regulations.

Santa Fe Irrigation District is a special district that provides drinking water services for residential, commercial, institutional and agriculture customers; critical water service for firefighting capabilities to two separate fire agencies; and recycled water for irrigation of HOAs, golf courses, schools, businesses and Caltrans. We maintain more than 160 miles of pipeline, 30 pressure reducing stations, water storage facilities, and over 1,200 fire hydrants that serve a population of approximately 21,000.

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 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.

SFID maintains approximately 30 public fleet vehicles for construction activities, system maintenance and repair, water quality monitoring, system operations, water treatment and customer service. Our agency recognizes that not all vehicle classes and configurations are subject

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to the Advanced Clean Fleets (ACF) regulations, however, the medium and heavy-duty fleet being regulated are some of the most important emergency response vehicles necessary for our District to supply critical water services. These vehicles are deployed around our service area to prepare and respond to infrastructure, customer, and other emergencies that occur 24 hours per day at all times of year, with our staff required to respond immediately regardless of location and time. The fleet also transports construction equipment, emergency pumps, generators to sites experiencing power outages, as well as ensuring the constant readiness of our 40 million gallon per day water treatment plant. SFID's fleet is indispensable for emergency preparedness and ensuring that this critical resource to more than 21,000 residents is available at all times.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the Oct. 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.

Local agencies like ours continue to play an important role in achieving the State's climate and emissions goals. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating unnecessary challenges for compliance while maintaining the many critical services Californians rely on for their most essential daily needs, as well as during emergencies and disasters.

Vehicles that that need to be categorically exempted from the regulations the same manner as those found in **part (c) of § 2013 of title 13 of the California code of regulations to include those vehicles that respond to, assist in and recover from disasters and emergencies to include: water utility vehicles, flood protection vehicles, sewer utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.**

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. If you or your staff should need any additional details, please do not hesitate to contact me at 858-756-5598 or alau@sfidwater.org.

Thank you for your consideration,

Sincerely,



Al Lau, P.E.
General Manager