



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 the Members of the California Air Resources Board:

We greatly appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While the goals of these regulations are laudable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

Union Public Utility District serves a 20 square mile service area and provides essential drinking and agricultural water supplies. Our vehicle fleet is critical to this mission, particularly during emergencies when vehicles must travel steep terrain and operate in severe conditions such as snow, heavy rain, and wildfires. These vehicles are often required to operate continuously for long periods and must remain fully functional during power outages, when electric charging infrastructure may be unavailable.

In addition, District vehicles routinely tow large trailers, tractors, water tanks, and other heavy equipment that require substantial energy and operational endurance. These demands are most common during emergency response and outage conditions, when rapid refueling and uninterrupted operation are essential. Given the need for long range, heavy towing, reliable performance in extreme environments, and operation independent of the electrical grid, electric vehicles are not currently a practical option for the District's fleet.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the October 7th 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 do our part 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 in complying while maintaining the many critical





services Californians rely upon 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.

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,


Jessica Self

General Manager

