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ESTABLISHED AS A PUBLIC AGENCY IN 1952
WEST VALLEY WATER DISTRICT'S MISSION IS TO PROVIDE
OUR CUSTOMERS WITH SAFE, HIGH QUALITY AND RELIABLE
WATER SERVICE AT A REASONABLE RATE AND IN A
SUSTAINABLE MANNER.

John Thiel
General Manager

Linda Jadeski
Assistant General Manager

Jose Velasquez
Chief Financial Officer

April 16, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Advanced Clean Fleets Regulation 15-Day Amendment Comments

To Chair Lauren Sanchez and the Members of the California Air Resource Board

West Valley Water District (WVWD) appreciates the opportunity to provide comments on the proposed Advanced Clean Fleets (ACF) regulation. We recognize and value the significant time and effort invested in developing the 15-day public comment draft. While the goals of these regulations are commendable, the reality is that we cannot safely and reliably serve our communities unless emergency support vehicles are fully exempted.

WVWD is a special district providing high-quality, potable retail water service to approximately 100,000 customers across portions of Rialto, Colton, Fontana, Bloomington, unincorporated areas of San Bernardino County, and part of Jurupa Valley in Riverside County. Spanning more than 26.2 square miles, our service area includes communities that rely on us for safe, clean drinking water and for maintaining adequate supply for firefighting, particularly in high-risk areas prone to extreme winds. In addition, our region's seismic activity poses a significant risk to critical infrastructure, creating vulnerabilities that could lead to earthquake-related damage and water delivery failures.

During emergencies, our teams perform essential, hands-on functions such as operating valves, managing system flows, and maintaining backup power systems to ensure uninterrupted service. Our core responsibility is to keep water flowing to customers and to support firefighters during emergency events.

These critical functions rely on vehicles that can travel long distances, remain ready at a moment's notice, and operate continuously under extreme conditions. Currently, no zero-emission alternatives can match the immediate readiness, range, and sustained operational capacity of gasoline-powered vehicles, particularly during Public Safety Power Shutoffs (PSPS), when electrical infrastructure is intentionally de-energized. Our region is routinely affected by high winds, PSPS events, and earthquake-related disruptions, all of which demand rapid, reliable, and sustained field response.

Under the current CARB proposal, resiliency is effectively capped by limiting exemptions to just 25 percent of our fleet. This constraint fails to reflect the unpredictable and demanding nature of emergencies. Disasters do not adhere to compliance timelines or arbitrary thresholds. Reducing 75 percent of our emergency-capable fleet would significantly impair our ability to respond, protect public safety, and maintain critical water service. In a state already facing severe wildfires, earthquakes, and extreme weather, such limitations risk compounding future emergencies.



In addition, the proposed requirements raise serious concerns about affordability for our ratepayers. As a public water agency, WVWD is directly accountable to the communities we serve. The accelerated transition to zero-emission vehicles, absent viable operational alternatives, would require substantial capital investment in vehicles, charging infrastructure, and grid upgrades. These costs would ultimately be shouldered by our customers through increased water rates, disproportionately impacting disadvantaged and working-class communities within our service area. Ensuring environmental progress must be balanced with maintaining essential services and keeping water affordable for the public.

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, flood protection vehicles, sewer utility vehicles, electric 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.

A handwritten signature in blue ink, appearing to read "John Thiel", is written over a faint circular stamp.

John Thiel PE, MBA
General Manager, West Valley Water District