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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

April 17, 2026

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

via e-mail

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.

At Las Virgenes Municipal Water District (District), we provide water and wastewater services to a community spanning 120-square miles in western portion of Los Angeles County. Most of which is within a designated high fire hazard zone. In 2018, 2/3rds of our service area was engulfed by the Woolsey Fire and power outages lasted for several weeks. In 2025, we were again faced with the destruction of the Palisades Fire. Our Headquarters Facility in Calabasas, where an electric vehicle fleet would need to be recharged, was without power for an entire week. During these fires, staff was required to mobilize with fleet vehicles to shut-off water services on homes that burned down, operate valves within the water system, turn off fire hydrants that were left on, position emergency generators at pump stations, deliver bottled water to customers, manually check water tank levels, and a large variety of other tasks both leading up to, during and after the fires.

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. In 2024, we adopted our Climate Action and Adaptation Plan, which aligns with the State's goals and have already implemented many measures. Most notably, we have invested and built a 5 mega-watt solar photovoltaic project that produces enough clean energy to operate our wastewater treatment plant. The 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

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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. Otherwise, many more homes and lives will be lost.

Sincerely,


Joe McDermott, PE
Assistant General Manager