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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.

Alameda County Water District (ACWD) provides safe, reliable water for drinking and firefighting to Fremont, Newark, and Union City across 105 square miles, serving 348,000 people, with a fleet that consists of medium and heavy duty (Class 2b – 8) vehicles. ACWD’s service area is traversed by the Hayward Fault and bordered by broad open spaces/wildland interfaces. In the course of our operations, including during emergencies, ACWD’s medium and heavy duty fleet vehicles are called upon to operate for extended periods, sometimes continuously for days, and often during inclement weather, in rugged and unimproved terrain and other challenging conditions. During emergencies and disasters, we work alongside many other emergency services agencies with all agencies relying on each other in a coordinated response.

To prevent unnecessary loss of life and property in the communities we serve, we urge you to 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 helping to achieve 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

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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 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 include those 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.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ed Stevenson', with a long horizontal flourish extending to the right.

Ed Stevenson
General Manager