



...Dedicated to Community Service

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

Subject: Comments on Proposed 15-Day Amendments to the Advanced Clean Fleets (ACF) Regulation (AB 1594)

Chair Lauren Sanchez and Members of the California Air Resources Board:

We greatly appreciate the time and effort that have gone into the 15-day comment draft, which 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 the Otay Water District, we provide essential potable, recycled, and sewer water services to a population of more than 242,000 residents across approximately 125.5 square miles of southeastern San Diego County—including eastern Chula Vista, Bonita, Jamul, Spring Valley, Rancho San Diego, unincorporated areas of El Cajon and La Mesa, and eastern Otay Mesa along the international border with Mexico. Given the size of our service area, District vehicles travel thousands of miles per day and traverse a multitude of areas to reach District assets. During emergencies, our vehicles must operate for extended hours and under challenging conditions to ensure our community's vital needs are met.

Additionally, Otay owns and operates a wastewater collection system providing public sewer services to homes and businesses within the Jamacha drainage basin, as well as delivers recycled water to customers through a dedicated distribution system used to irrigate golf courses, playing fields, public parks, roadside landscapes, and open space in eastern Chula Vista.

Otay maintains 94 public fleet vehicles, including construction, utility repair, utility monitoring, and customer service vehicles. These vehicles are deployed around the clock—24/7—to prepare for and respond to emergencies such as wildfires, flooding, and infrastructure failures. For example, Otay's water and wastewater specialty emergency vehicles are often dispatched to wildfire-prone areas to support firefighting efforts, including restoring fire flows and maintaining critical water pressures for fire protection. The fleet also transports construction vehicles, emergency mobile pumps, and generators to sites experiencing power outages or water main breaks, ensuring uninterrupted service and swift recovery. These specialty vehicles are designed to travel long distances, navigate rough, uncertain terrain, and operate auxiliary equipment via power-take-off devices at project sites. Their long duty cycles and unique specifications enable them to serve as shelters and operate auxiliary equipment during extreme weather conditions, allowing staff to work safely in remote areas of the District and maintain vital services for the community. Otay's fleet is indispensable for emergency preparedness, response, and ongoing support, adapting to the growing challenges posed by climate change and ensuring resilient service delivery.

Below is a list of the emergency preparedness, response, and support Otay provides. This list includes, but is not limited to, the following:

- **Wildfire support:** Deploying vehicles to wildfire areas for restoring fire flows and pressures, assisting firefighting teams, and maintaining water supply for fire prevention.
- **Flood and storm response:** Transporting emergency pumps and generators to flood-affected sites to mitigate damage and restore essential services.
- **Infrastructure repair:** Moving construction vehicles and repair crews to sites experiencing water main breaks, sewer outages, or power failures to ensure rapid recovery.
- **Emergency shelter and support:** Specialty vehicles serve as temporary shelters for staff and operate auxiliary equipment in remote and extreme weather conditions.
- **Continuous monitoring:** Utility monitoring vehicles operate 24/7 to assess and respond to system vulnerabilities, ensuring reliability and safety for residents.

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 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 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](#), [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.

If you have any questions or concerns, please contact me at (619) 670-2210 or jose.martinez@otaywater.gov. Thank you for your time and consideration.

Respectfully submitted,



Jose Martinez
General Manager
Otay Water District