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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 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 Western Municipal Water District, we serve nearly 1 million people across 527 square miles in western Riverside County. The communities, businesses, and environment we serve rely on Western for 24/7/365 water, sewer, and recycled water services. Because of these critical services, responding to emergencies is a top priority for us. In response to emergencies such as PSPS, electrical outages, leaks, and fires, our vehicles must travel throughout Western's 527-square-mile service area and maintain continuous operations. We have experienced outages lasting up to 15 days as recently as January 2025. According to the most recent [CAL FIRE map](#), roughly 80 percent of Western's service area falls within the Fire Hazard Severity Zone. During the January 2025 event, Western received public safety power shutoffs at 15 critical sites for two weeks from Southern California Edison during red flag conditions.

As a result, Western faced multiple power outages and had to deploy 12 generators to keep these critical sites operational. In high-stakes emergencies, we cannot afford limitations on range, charging access, or grid reliability. We need vehicles that are immediately available and capable of operating around the clock for extended periods to ensure uninterrupted water and wastewater service. There are currently no zero-emission alternatives that can match the immediate readiness and operational duration of gasoline-powered vehicles, *especially* when the power is shut off.

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 play our part in achieving the State's climate and emissions goals. Our proposed amendments will enable us to meet this challenge better 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 emergency service-supporting vehicles to continue serving our communities when we need them most.

Very Respectfully,



CRAIG D. MILLER, P.E.  
General Manager