

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.

The Coastside County Water District provides drinking water to approximately 19,000 people located in the City of Half Moon Bay and unincorporated communities within San Mateo County. The District is situated along the San Mateo County coast and is geographically separated from other urban areas, such as the City of San Mateo, by the Santa Cruz Mountains, with limited access routes in and out of the service area.

During storm events and other emergencies, the District can—and has—become isolated. Under such conditions, District vehicles may be required to operate continuously for up to 24 hours to support emergency response activities. In addition, much of the District’s critical infrastructure that must be accessed during emergencies is located off-road in remote areas. In these conditions—particularly during storms—limited charging availability could result in vehicles becoming stranded, posing potential safety risks to staff.

The District’s service area is also subject to frequent power outages, which limits the ability to recharge and redeploy electric vehicles during emergency situations. Furthermore, many specialized water utility trucks are not currently available as an electric vehicle due to battery weight constraints and the resulting limitations on hauling heavy water-related tools and equipment.

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.

Thank you for your consideration,



Mary Rogren  
General Manager  
Coastside County Water District