



April 14, 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:

On behalf of Monte Vista Water District (MVWD), thank you for the opportunity to comment on this draft regulation that has been published for public comment. While the regulation goals are laudable, the reality is that water agencies like ours cannot safely serve our communities unless emergency support vehicles are exempted.

MVWD directly provides drinking water to approximately 56,400 people over a 10 square mile area, including the City of Montclair and portions of Chino and unincorporated San Bernardino County. In addition, MVWD provides wholesale water service to the City of Chino Hills, which accounts for approximately 50% of their drinking water supplied to 77,300 residents. Our communities rely on us for potable water for hydration, cooking, hygiene, firefighting, and business operations – an essential service that is, and must continue to be, available 24/7/365. To maintain this essential service, MVWD responds to outages and emergencies around the clock, during blue sky days and times of disaster. Additionally, we participate in statewide and regional mutual aid agreements to help augment the services of other water agencies in times of disaster.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the letter dated October 7, 2025, 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.

Along with local agencies like ours, MVWD continues to do its part in achieving the State's climate and emissions goals as well as supporting our own environmental stewardship goals. Our proposed amendments will enable us to better meet these challenges and effectively navigate the current Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. *Of critical concern is the ACF and its unnecessary compliance*



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challenges that local agencies face while maintaining the many critical services Californians rely upon for their most essential needs, like drinking water, both daily 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 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.

MVWD has a small fleet that supports its delivery of drinking water to more than 133,000 people. As we look to replace some of our utility-specialized vehicles, we have found that there aren't any ZEVs like them. MVWD's current vehicle configuration is critical to our operations, making them a specialized unit that can't be replaced easily. While we anticipate the marketplace will continue to evolve, we also know that costs continue to rise. The replacement costs associated with our compliance efforts will be incredibly burdensome to the district and must be passed on to our ratepayers, which provide 80% of our revenue. As ethical and responsible stewards of the district's finances, we work hard to keep water affordable for our community members because it is an essential need. Unfortunately, there are competing priorities such as safe drinking water regulations that can also drive costs up, making the balance between affordability and compliance a constant battle.

We respectfully request that CARB amend the ACF exemptions to categorically exempt water utility vehicles and other critical infrastructure vehicles that respond to emergencies and disasters, consistent with the exemptions provided under 13 CCR § 2013(c). This will ensure MVWD and other critical service providers can respond to the community's needs 24/7/365 and continue serving our communities when they need us most.

Sincerely,



Justin Scott-Coe
General Manager/CEO