



April 9, 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.

Padre Dam Municipal Water District provides water, sewer, and recycled water to more than 105,000 residents in East San Diego County. Our service area spans 73 square miles and has significant elevation changes of more than 2,200 ft. During emergencies it is our responsibility to keep water flowing to customers and firefighters throughout the emergency event. Our crews manually operate valves, adjust flows, switch water sources, and fuel standby generators to keep pump stations operating during emergencies in which power outages have become increasingly common. Responding to infrastructure failures such as water main breaks or pump station failures can require a multi-day response to complete repairs and resume service to our customers. Each of these tasks requires reliable vehicles that can travel long distances, remain ready at a moment's notice, and operate continuously.

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,

Kyle Swanson
CEO/General Manager