



TUOLUMNE UTILITIES DISTRICT

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April 8, 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 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.

Tuolumne Utilities District serves a geographically dispersed rural service area spanning approximately 1,400 square miles, encompassing mountainous and remote terrain. Our customers rely on the District for continuous water and wastewater services that are essential to public health, fire protection, and emergency response. During emergency events—including wildfires, severe storms, flooding, and extended power outages—District vehicles must travel long distances to access critical infrastructure and are required to operate continuously for extended periods, often away from the main TUD yard for 12-24 hours at a time, under rugged terrain, limited access, and adverse weather conditions. The reliability, range, and refueling flexibility of these vehicles are critical to maintaining uninterrupted service and protecting life and property during emergency response operations.

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,



Don Perkins
General Manager