

Dublin San Ramon Services District (Sara Tom)

Please see attached letter from Dublin San Ramon Services District.



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April 13, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBJECT: Advanced Clean Fleets 15-Day Comment Period Response

Chair Lauren Sanchez and the Members of the California Air Resources Board:

Thank you for the opportunity to comment on the Advanced Clean Fleets (ACF) regulations. Dublin San Ramon Services District (DSRSD) provides critical water and wastewater services to approximately 200,000 residents and businesses in Alameda and Contra Costa counties. While the goals of the ACF regulations are laudable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

Our community relies on us for water and wastewater services 24/7, and we must also be prepared to provide these critical services during emergencies such as earthquakes and fires. Several vulnerabilities arise when relying solely on electrically powered vehicles. Power outages are common during emergencies, and uninterrupted access to fully operational fleet vehicles is essential. Field operations staff must be assured that all fleet vehicles will remain dependable under any emergency conditions.

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 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 should be categorically exempt from the regulations—**consistent with the exemptions listed in part (c) of § 2013, title 13 of the California Code of Regulations**—include those used to respond to, assist with, and recover from emergencies and disasters. These include water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention and 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,

Jan R. Lee
General Manager