

Olivenhain Municipal Water District (Kimberly Thorner)

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.

OMWD is a special district that provides 87,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

According to the most recent CALFIRE map, about 70 percent of our service area is high risk. Our responsibility during emergencies is to keep water flowing to customers and firefighters for the duration of the event. Yet when people evacuate, water continues running through melted fixtures in destroyed homes—as we saw in the Palisades fires—which drains the system. Our staff deploys across our 48-square-mile service area in the middle of fires to shut off meters so that water pressure is maintained for firefighting.

In addition to turning off meters, they manually operate valves, adjust water flow, run facilities, switch water sources, and fuel standby generators to keep pump stations operating.

Every one of these tasks requires vehicles that can travel long distances, remain ready at a moment's notice, and operate continuously. There are currently no zero emission alternatives available that can provide the level of immediate readiness and operational duration the gasoline-powered vehicles offer, especially when the power is shut off as is routinely done during red flag events.

The current CARB proposal places an artificial cap on resiliency in that no more than 25 percent of our fleet could be exempt from conversion to ZEV. This dangerous cap ignores the realities we face. Emergencies don't wait for regulations, and they don't scale themselves to fit an arbitrary fleet percentage. Reducing our usable emergency vehicles by 75 percent would endanger the communities we serve. California has already experienced devastating wildfires and extreme weather—common sense tells us that constraints like this could magnify future disasters dramatically.

Local agencies cannot have their ability to respond capped, especially when major incidents require regionwide support. Fire trucks, ambulances, school buses and police vehicles are exempt, but the support vehicles that enable emergency response—such as trucks that tow fuel to water pumps—are not. This directly impacts the ability of firefighters to do their job.

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

Of critical concern to our communities, the ACF mandates are creating unnecessary challenges for local agencies in maintaining the many critical services Californians rely upon for their most essential daily needs 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 must also include support vehicles that respond to, assist in, and recover from disasters and emergencies, including water and sewer utility vehicles. These vehicles must be included without a 25% arbitrary cap. Emergencies don't scale themselves to percentages.

I also want to thank the CARB staff for their engagement on these regulations. While we do not support the proposed regulations as they place an artificial 25% cap on our ability to respond in emergencies, we are appreciative of the process and the conversations to date. Tony Brasil and staff from CARB made themselves available for meetings with our agency and others to hear our concerns and share information over the past year. While we do not support the result proposed today, we are appreciative of the process that staff undertook for engagement.

We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we are needed the most. If you or your staff should need any additional details, please do not hesitate to contact me at 760-753-6466 or kthorner@olivenhain.com.

Sincerely,

Kimberly A. Thorner
General Manager

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

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Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberly A. Thorner". The signature is fluid and cursive, with a large initial "K" and "T".

Kimberly A. Thorner
General Manager