



## Utilities Department

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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 the Members of the California Air Resources Board:

We greatly appreciate the time and effort that has gone into the 15-day comment draft 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.

The City of Encinitas Utilities Department oversees three essential systems that provide critical public-health and safety services to the community: the San Dieguito Water District (SDWD) water system, the Cardiff Sanitary Division (CSD), and the Encinitas Sanitary Division (ESD). SDWD delivers potable water across a diverse 5,647-acre service area that includes Old Encinitas, Leucadia, Cardiff, and parts of New Encinitas, serving approximately 40,000 customers. CSD provides wastewater collection services to roughly 20,000 residents across an 8.3-square-mile area in the southern and eastern portions of the city, while ESD serves about 17,000 residents within a three-square-mile area in the central and western parts of Encinitas.

These three systems—water, wastewater (CSD), and wastewater (ESD)—are all dependent on vehicles that must respond immediately, travel long distances, and operate for many hours during emergency conditions, including Public Safety Power Shutoffs. The document stresses that zero-emission alternatives are not currently capable of meeting these demanding operational requirements, especially when power is out. Because uninterrupted water delivery, fire-protection support, and wastewater system reliability are vital to protecting life and property, the Department emphasizes the necessity of maintaining vehicles that can function independently of the electric grid during high-stakes events.

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; however, the current Advanced Clean Fleets (ACF) mandates create unnecessary challenges in maintaining essential daily needs and emergency response capabilities. The current proposal places an artificial cap on resiliency by limiting exemptions to no more than 25 percent of a fleet, which ignores the reality that emergencies do not scale to an arbitrary percentage.

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 include those vehicles that respond to, assist in and recover from disasters and emergencies to include: water utility vehicles and water tenders, flood protection vehicles, sewer utility vehicles and Vector trucks, 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,

Signed by:  
  
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City of Encinitas  
Director of Utilities