

April 17, 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 appreciate the time and effort that has gone into preparing the 15-day comment draft for public review. We support the State's air-quality and climate goals; however, as written, the Advanced Clean Fleets (ACF) requirements risk limiting our ability to respond to wastewater emergencies and protect public health. We respectfully request targeted amendments to ensure that essential emergency response and critical infrastructure vehicles can continue operating reliably when communities need them most.

West County Wastewater District (WCW) serves approximately 34,000 residents and 900 commercial and industrial customers (nearly 100,000 people in total) in Contra Costa County. We own, operate, and maintain 249 miles of gravity sewers, 17 lift stations, 6 miles of force mains, and a Water Quality and Resource Recovery Plant with a capacity of 12.5 million gallons per day average dry-weather flow. These services depend on our 27-vehicle fleet and 24/7 on-call staff to prevent sewer overflows, protect waterways, and respond to emergencies.

To avoid unnecessary risk to life, property, and the environment, we ask the Board to reconsider the amendments requested in the October 7 letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties—organizations that collectively represent approximately 5,000 local agencies serving 40 million residents. Specifically, WCW requests that the ACF truck regulations not apply to government fleets with fewer than 50 vehicles. As drafted, the purchase mandates create significant financial strain on essential services, and the exemption process is difficult to navigate because requirements are dispersed across multiple code sections and are administratively burdensome.

WCW is actively supporting the State's emissions reduction goals while maintaining critical public health infrastructure. Our efforts include providing treated water for industrial reuse, supplying approximately one-third of WCW's energy needs through on-site solar, offering community accessible electric vehicle charging, and transitioning light-duty vehicles to zero-emission options where feasible. For medium- and heavy-duty wastewater and emergency-support vehicles, however, available zero-emission models and upfits often do not meet required duty cycles, payload/towing needs, or serviceability requirements. In addition, the limited number of compliant manufacturers constrains competitive bidding and can delay procurement and maintenance. Additional flexibility for these vehicles would help local agencies comply

without compromising essential services that Californians depend on daily and during emergencies and disasters.

Requested clarification/expansion of categorical exemptions: We request that CARB amend the ACF exemptions to treat additional disaster- and emergency-response fleet vehicles in the same manner as those identified in **§ 2013(c), Title 13, California Code of Regulations**, including the following categories: **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.**

Accordingly, WCW respectfully requests that CARB (1) expand the ACF categorical exemptions to include wastewater and other emergency support utility vehicles as described above, and/or (2) exclude government fleets with fewer than 50 vehicles from the purchase mandates. We would welcome the opportunity to discuss practical compliance pathways and provide additional operational details.

Please confirm receipt of this comment letter and advise on next steps.

Thank you for your consideration,

Signed by:  
  
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Andrew Clough  
General Manager  
West County Wastewater District