



# TOWN OF DISCOVERY BAY

A COMMUNITY SERVICES DISTRICT

SDLF Platinum-Level of Governance



PLATINUM LEVEL

President – Bryon Gutow • Vice President – Kevin Graves • Director – Ashley Porter • Director – Carolyn Graham • Director – Lesley Belcher

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April 13, 2026

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

**Subject: Opposition to Proposed Amendments to the Advanced Clean Fleets Regulation and Request for a Categorical Emergency Support Vehicle Exemption**

Dear Chair Sanchez and Members of the California Air Resources Board,

The Town of Discovery Bay Community Services District (CSD) respectfully submits this letter of opposition to the California Air Resources Board's (CARB) latest proposed amendments to the Advanced Clean Fleets (ACF) regulation, posted on April 2, 2026, and open for public comment through April 17, 2026. The proposed amendments do not go far enough to protect local agencies that must maintain essential services during emergencies, particularly water and wastewater utilities that depend on reliable, immediately deployable vehicles under severe conditions.

The Town of Discovery Bay has faced multiple emergency situations in recent years, including severe storms, localized flooding, and prolonged electrical outages. In those conditions, water and wastewater crews must be deployed immediately to assess damage, repair broken lines, inspect lift stations, support treatment operations, and protect public health and safety. These duties cannot be delayed without serious consequences to residents and critical infrastructure.

In recent years, the Town has experienced firsthand how emergency conditions can quickly overwhelm local systems. During major winter storms, intense rainfall strained water and wastewater operations and affected streets and levees, requiring immediate field response. During separate winter events, PG&E-related power outages lasted for several days. If the fleet available during those incidents had consisted only of zero-emission vehicles, our operational response would have been significantly constrained by charging availability and power reliability.

Zero-emission vehicle technology and the associated infrastructure still present serious limitations for agencies with emergency utility responsibilities. Currently, local agencies depend on vehicles capable of towing heavy equipment such as pumps, generators, and compressors during emergency situations. However, comparable electric vehicles often have significantly lower towing capacities, in some cases less than half, or are not rated for towing at all in some U.S. models. Furthermore, gasoline and diesel-powered vehicles offer immediate operational readiness and sustained performance, advantages that zero-emission alternatives may not consistently provide, particularly during power outages.

These limitations are especially important for small local agencies. Battery range constraints, limited charging access during outages, and the practical difficulty of keeping emergency-response vehicles

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charged during non-emergency windows can delay restoration work and reduce flexibility when fast deployment is necessary. As a CSD responsible for core public health functions, those risks are not theoretical; they directly affect service continuity and emergency resilience.

In addition, the cost of transitioning to zero-emission vehicles remains substantial. CARB's rulemaking continues to require state and local government medium and heavy-duty fleets to transition toward zero-emission vehicles under the remaining enforceable portions of ACF. For smaller agencies, the upfront costs of charging infrastructure, vehicle replacement, electrical upgrades, and site preparation can divert limited funds away from urgent facility maintenance, system reliability, and compliance with other state mandates. While the Twon supports the long-term transition to cleaner vehicles, environmental progress and operational reliability should not be treated as competing goals. Instead, this transition must be implemented in a way that does not compromise emergency response, public safety, or the continuity of essential water and wastewater services.

The Town of Discovery Bay CSD urges CARB to categorically exclude vehicles reasonably anticipated to respond to emergency situations, or that support those efforts, from the regulation, similar to the existing exclusion for snow removal vehicles. That request is both practical and consistent with the Legislature's direction in AB 1594, which was intended to provide public agency utilities with flexibility when replacing specialized vehicles needed to maintain reliable service or respond to severe events such as wildfires, storms, natural disasters, and other large-scale emergencies.

Specifically, for The Town of Discovery Bay CSD and similarly situated districts, a more workable policy would include:

- A categorical exemption for vehicles used to respond to or support emergency operations.
- Broader flexibility for water, wastewater, flood control, and related utility vehicles that must remain available during storms, outages, and other disasters.
- Compliance timelines that reflect real-world technology availability, towing needs, charging limitations, and rural or small-agency budget constraints.
- Funding and infrastructure support must be in place before compliance obligations become mandatory.

Therefore, the Town of Discovery Bay CSD respectfully urges CARB to revise the proposed amendments and adopt a categorical exemption for emergency support vehicles, along with broader and more practical flexibility for small public agency utility fleets. A regulation that recognizes the realities faced by frontline local agencies will better balance California's environmental objectives with the duty to protect communities during emergencies.

Thank you for your consideration.

Sincerely,



Dina Breistein, General Manager  
Town of Discovery Bay Community Services District