

North Tahoe Public Utility District (Bradley Johnson)

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:

On behalf of the North Tahoe Public Utility District (NTPUD), we 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 from the proposed Advanced Clean Fleets (ACF) regulations.

The NTPUD provides water and wastewater services to the communities of Kings Beach, Tahoe Vista, Brockway Vista, Carnelian Bay, Cedar Flat, and Agate Bay. We serve nearly 4,000 water customers with 52 miles of water pipelines and over 5,200 sewer customers through 75 miles of sewer pipe, maintaining over 370 fire hydrants, 20 pumping stations, and 4.65 million gallons of water storage.

The NTPUD operates at elevations above 6,200 feet, where heavy snowfall, freezing temperatures, and limited road access are common in the winter. During emergencies, our vehicles must travel steep, snow-covered roads, run for hours at a time in sub-zero temperatures, and reach remote infrastructure sites. Our vehicles are essential to maintaining water pressure for fire suppression efforts and keeping our sewer collection systems operational under heavy demand, at all hours of the day.

To prevent unnecessary loss of life and property in the communities we serve, we request your reconsideration of 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 on behalf of the state's 5,000 local agencies and 40 million residents.

Specifically, we urge the Board to categorically exempt emergency support vehicles in the same manner as those found in part (c) of § 2013 of title 13 of the California Code of Regulations.

This exemption should extend to all vehicles that respond to, assist in, and recover from disasters and emergencies, including water utility vehicles, sewer utility vehicles, flood protection vehicles, electric utility vehicles, fire prevention and protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

Vehicles that that need to be categorically exempted from the regulations the same manner as those

found in part (c) of § 2013 of title 13 of the California code of regulations to include those vehicles that respond to, assist in and recover from disasters and emergencies to include: 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.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. These 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.

We respectfully request that you amend the ACF exemptions to allow our water and sewer utility vehicles that support emergency services to continue serving our communities when we need them most.

Thank you for your consideration,

Bradley A. Johnson, P.E.
NTPUD General Manager



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A handwritten signature in blue ink, appearing to read "Bradley A. Johnson".

Bradley A. Johnson, P.E.
NTPUD General Manager