

# Ben Dewell – Director, Stallion Springs Community Service District (Ben Dewell)

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:

April 15, 2026

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.

At the Stallion Springs Community Services District, we serve a very small rural community of just 3,139 residents. The cost associated with replacing our support vehicles would place a significant financial hardship on the District and, ultimately, on the community we serve. These expenses would divert limited funds away from essential operations and compromise the resources necessary to ensure the continued availability of critical emergency services for our residents.

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. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (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.

Specific considerations for Community Service Districts include:

- 1) Stallion Springs, as many limited funded Community Service Districts in California, struggles to balance its budget under the strain unfunded state mandates and current constraints of limited property tax funding
- 2) Replacement e-vehicles are still expensive and for the most part lack sufficient power for many tasks required to maintain critical infrastructure in a rural environment.
- 3) E-vehicles are becoming less available both at affordable prices and in sufficient numbers due to the President's turn away from renewable energy technology.

Vehicles 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.

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.

Sincerely,  
Ben Dewell  
Director, Stallion Springs Community Service District  
27800 Stallion Springs Dr.  
Stallion Springs, CA 93561  
661-822-3268  
[board4@stallionspringscsd.com](mailto:board4@stallionspringscsd.com)



# STALLION SPRINGS COMMUNITY SERVICES DISTRICT

27800 STALLION SPRINGS DRIVE, TEHACHAPI, CA 93561  
(661) 822-3268, FAX (661) 822-1878, [sscsd@stallionspringscsd.com](mailto:sscsd@stallionspringscsd.com)

April 15, 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 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.

At the Stallion Springs Community Services District, we serve a very small rural community of just 3,139 residents. The cost associated with replacing our support vehicles would place a significant financial hardship on the District and, ultimately, on the community we serve. These expenses would divert limited funds away from essential operations and compromise the resources necessary to ensure the continued availability of critical emergency services for our residents.

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. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (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.



# STALLION SPRINGS

## COMMUNITY SERVICES DISTRICT

27800 STALLION SPRINGS DRIVE, TEHACHAPI, CA 93561  
(661) 822-3268, FAX (661) 822-1878, [sscsd@stallionspringscsd.com](mailto:sscsd@stallionspringscsd.com)

Specific considerations for Community Service Districts include:

- 1) Stallion Springs, as many limited funded Community Service Districts in California, struggles to balance its budget under the strain unfunded state mandates and current constraints of limited property tax funding
- 2) Replacement e-vehicles are still expensive and for the most part lack sufficient power for many tasks required to maintain critical infrastructure in a rural environment.
- 3) E-vehicles are becoming less available both at affordable prices and in sufficient numbers due to the President's turn away from renewable energy technology.

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.

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.

Sincerely,

Ben Dewell  
Director, Stallion Springs Community Service District  
27800 Stallion Springs Dr.  
Stallion Springs, CA 93561  
661-822-3268  
[board4@stallionspringscsd.com](mailto:board4@stallionspringscsd.com)