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CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

April 16, 2026

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

RE: Advanced Clean Fleets 15-Day Comment Period Response

Dear Chair Lauren Sanchez and Members of the California Air Resources Board:

Fresno Irrigation District (FID or District) greatly appreciate the time and effort that has gone into the 15-day comment draft that was published for public comment. While the goals of these regulations are laudable, the reality remains that FID cannot safely serve our communities and stakeholders unless emergency support vehicles are exempted.

FID's boundary includes more than 250,000 acres and includes 670 miles of pipelines and canals used to deliver surface water to the Cities of Fresno and Clovis, serving approximately 750,000 people combined, and to farmers within the District. FID conveys surface water to the Cities for treatment at their surface water treatment plants prior to it being delivered to the individual households in their boundaries. Service delivery interruptions create a health and safety concern due to lack of an adequate supply of drinking water for the Cities and potential flooding to parcels near the District's canals due to canal breaks and other infrastructure damages. Additionally, during the winter months, FID's canals and pipelines are used for routing floodwater away from the urban core to its basins located outside of the cities. Failing to properly route the floodwater during these events will lead to wide-spread flooding and a loss of the water supply to the local area. During these types of routine and emergency situations, FID's water system operators can travel more than 250 miles per day during a 12-hour shift.

To prevent unnecessary loss of life and property damages within the District boundary and to ensure FID can deliver surface water and route floodwaters, 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 California's 5,000 local agencies and 40 million residents.

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Local agencies like FID continue to do our part in achieving the State's climate and emissions goals. The 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 FID is 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.

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.

If you have any questions, please contact Adam Claes at 559-233-7161 or aclaes@fresnoirrigation.com.

Sincerely,



Bill Stretch, General Manager