

Rancho Santa Fe CSD (Chuck Duffy)

Please see attached letter.

RANCHO SANTA FE COMMUNITY SERVICES DISTRICT

STAFF

Chuck Duffy, General Manager
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April 17, 2026

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

Re: Proposed Advanced Clean Fleets Regulation 15-Day Comment Period Response

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

We understand that much time and effort has gone into the Advanced Clean Fleets (ACF) Regulations that have 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. The relatively minimal effect these regulations would have on clean air in a state with over 36 million registered vehicles is dwarfed by the catastrophic effect the regulations would have on public safety during an emergency.

Our agency provides sewer service to a community of approximately 9,500 ratepayers, with 65 miles of sewer main, 21 pump stations, and 2 sewer treatment plants. During emergencies our vehicles must travel all throughout our district servicing this critical public infrastructure. This is especially true due to our location in southern California, which is subject to wildfires driven by Santa Ana winds.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments requested in the October 7th letter submitted by the California Special Districts Association, the League of California Cities, and the 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.

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 strongly 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,



Chuck Duffy, General Manager
Rancho Santa Fe Community Services District