



# Inverness Public Utility District

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Inverness, CA 94937-0469

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 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.

The Inverness Public Utility District (IPUD) provides fire and emergency services protection and operates a municipal water system to its service area within the unincorporated community of Inverness, Marin County (population 1,400 with 520 water connections). IPUD's service area encompasses some 1,600 acres. Included within the District's area are National and State Park attractions that bring numerous visitors from the Bay Area for recreation. During emergencies our vehicles must travel anywhere within the service area, at numerous elevations and in all conditions.

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.

Vehicles that that need to be categorically exempted from the regulations in 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.

Thank you for your consideration,

*Shelley L Redding*

Shelley L Redding  
General Manager

Board of Directors: Kathryn Donohue President • Ken Emanuels, Vice President  
David Press, Treasurer • Brent Johnson • Dakota Whitney



Shelley Redding, General Manager  
David Briggs, Fire Chief. Richard J Perez, Water System Superintendent