



April 17, 2026

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

Re: Advanced Clean Fleets 15-Day Comment Period Response

Dear 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 Sacramento Suburban Water District (SSWD) we serve a community of nearly 200,000 people across a 37 square mile service area. Our community relies on us for the uninterrupted delivery of potable water, a mission that requires our vehicles to be deployed to respond to emergencies that may occur at any time, around the clock, 24 hours per day. In these critical scenarios, our fleet must remain on-site for extended durations—often in inclement conditions—to ensure the restoration of essential services. The Advanced Clean Fleets regulation must recognize that for a water utility, vehicle readiness is a constant, 24/7 requirement. The current Advanced Clean Fleets requirements must account for these life-safety duty cycles, where vehicle uptime and reliable power are not just operational preferences, but absolute requirements for maintaining essential public water service.

To prevent unnecessary loss of life and property in the communities SSWD serves, 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 SSWD continue to do our part in achieving the State's climate and emissions goals. The proposed amendments will enable SSWD 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 SSWD vehicles that support emergency services to continue serving our communities when we need them most.

If you have any questions or need additional information, please do not hesitate to contact me at (916) 972-7171 or dyork@sswd.org.

Sincerely,



Dan York
General Manager

