

201 Vallecitos de Oro · San Marcos, California · 92069-1453 · (760) 744-0460

April 8, 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.

As an independent, special district, the Vallecitos Water District is dedicated to providing water, wastewater, and reclamation services to over 105,000 people in a 45-square-mile area that includes San Marcos; the community of Lake San Marcos; portions of Carlsbad, Escondido, and Vista; and other surrounding unincorporated areas. During emergencies our vehicles may need to travel 22 miles or more. Further, they may need to operate for 16 hours or more in any weather 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 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,

A handwritten signature in black ink, appearing to read 'J. Gumpel', written in a cursive style.

James H. Gumpel, P.E.  
General Manager  
Vallecitos Water District