



TAHOE CITY PUBLIC UTILITY DISTRICT

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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 the Members of the California Air Resources Board:

The Tahoe City Public Utility District (TCPUD) greatly appreciates 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 admirable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

TCPUD serves a geographically diverse community spanning 31 square miles, with operations extending across half of the North Shore and the West Shore of Lake Tahoe south to Emerald Bay. We provide essential water and wastewater services to approximately 6,208 water customers and 7,778 sewer customers. These services are critical to public health and environmental protection.

To meet the needs of our community, TCPUD maintains a specialized utility fleet that includes two combination sewer cleaner vacuum trucks and crane trucks, along with several other heavy-duty service vehicles. During emergencies, these vehicles are indispensable for responding to a wide range of critical situations, including power outages, emergency bypass sewer operations, water main breaks, and sanitary sewer overflows. In many cases, they must operate continuously for extended periods to ensure uninterrupted service and to safeguard the health and safety of both our community and the surrounding environment.

Our operations take place in an exceptionally challenging environment. We routinely face prolonged power outages that can last a week or more, severe winter storms producing 5 to 10 feet of snow at a time, significant flooding events, and wildfire emergencies. These conditions demand highly reliable, flexible, and readily deployable equipment.

At present, zero-emission vehicle technologies are not yet capable of meeting the operational demands of our emergency response requirements. Additionally, the necessary charging infrastructure is not available in our region to support the continuous, around-the-clock use that our community depends upon.

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.

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.

Vehicles 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 are vehicles that respond to, assist in and recover from disasters and emergencies and 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,

A handwritten signature in blue ink, appearing to read 'DL', is centered within a white rectangular box.

Dan Lewis
Director of Utilities