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Date: April 15, 2026

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

Subject: Advanced Clean Fleets 15-Day Comment Period Response

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 Union Sanitary District, we operate within a 60-square-mile service area, providing critical wastewater collection, conveyance, and treatment for the communities of Fremont, Newark and Union City. System reliability is essential to maintaining regulatory compliance and protecting public health and the environment.

During emergency response operations, fleet assets must maintain a high state of readiness to support continuous field activities with minimal notice. Vehicles are required to operate for extended durations; often exceeding 24 hours of continuous or near-continuous use and under a wide range of environmental and operational conditions. This necessitates rigorous preventive maintenance, robust equipment specifications, and high reliability standards to ensure uninterrupted service delivery during critical events.

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.

Thank you for your consideration,
Jose Rodrigues
Fleet & Collection Services Manager