



June 12, 2026

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

**RE: Advanced Clean Fleets 2<sup>nd</sup> 15-Day Comment Period Response**

Chair Lauren Sanchez and Members of the California Air Resources Board:

We appreciate the time and effort that has gone into the second 15-day comment period draft of the Advanced Clean Fleets (ACF) regulation published June 1, 2026 for public comment. While the goals of these regulations are laudable, the reality remains that Padre Dam Municipal Water District cannot safely serve our communities unless emergency support vehicles are excluded from the regulation.

Padre Dam provides water, sewer, and recycled water to more than 105,000 residents in East San Diego County including Santee, El Cajon, Lakeside, Flinn Springs, Harbison Canyon, Blossom Valley, Alpine, Dehesa, and Crest. Our service area spans 73 square miles and has significant elevation changes of more than 2,200 ft. During emergencies it is our responsibility to keep water flowing to customers and firefighters throughout the emergency event. Our crews manually operate valves, adjust flows, switch water sources, and fuel standby generators to keep pump stations operating during emergencies in which power outages have become increasingly common. Responding to infrastructure failures such as water main breaks or pump station failures can require a multi-day response to complete repairs and resume service to our customers. Each of these tasks requires reliable vehicles that can travel long distances, remain ready at a moment's notice, and operate continuously.

To prevent unnecessary risks to public health, water quality and property in the communities we serve, please reconsider the amendments respectfully requested in the April 14th 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 ACF regulation and its ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating untenable 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.

The exemptions in the current regulation and draft amendments remain dangerously insufficient. The amendments do not clearly and categorically protect specialized water and wastewater utility vehicles and support vehicles necessary to respond to critical situations during emergencies, urgent public health situations and long-term emergency responses.

Specialized water and wastewater emergency vehicles may need to operate continuously for several days during emergency conditions or certain wet weather conditions. Reliable zero-emission vehicles with the necessary size, power, range, and specialized equipment capabilities are either not currently available or

not yet proven for this type emergency response. Long charging times and extended power outages could significantly hinder emergency response and restoration of service when these vehicles are needed most. A common occurrence during emergency scenarios (ie. Fires, PSPS events, wind events, floods) is the loss of electrical power for extended periods of time. This would further hinder a public utilities ability to respond if we are without power and unable to charge vehicles during these extended periods.

#### **Emergency Exemption**

In the same manner as the vehicle categories currently identified in **part (c) of § 2013 of title 13 of the California code of regulations**, we respectfully request a categorical exclusion for specialized water and wastewater utility vehicles and support vehicles and emergency-support vehicles that respond to, assist in, prevent, mitigate and recover from disasters and emergencies, and urgent threats to public health and safety. This should 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.

#### **Third-party Contracts**

We are concerned the proposed amendment would significantly expand the scope of the regulation beyond vehicles owned or leased by public agencies and would create substantial compliance, legal, operational, and financial challenges for local agencies providing essential public services.

The proposed language appears to place public agencies in an untenable position. Under the amendment, a public agency may effectively be required to either:

1. Require private contractors to utilize zero-emission vehicles as a condition of providing services to the agency; or
2. Account for privately owned and operated internal combustion engine vehicles within the agency's fleet compliance obligations and offset those vehicles through additional public agency fleet conversions.

Padre Dam is concerned that neither option is practical, equitable, or consistent with the original purpose of the regulation.

Padre Dam appreciates the opportunity to provide comments and respectfully requests that CARB reconsider two significant areas of this regulation.

1. We 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.
2. We request that public agencies should not be placed in a position where compliance depends upon the fleet composition of independent contractors over whom they have no ownership, operational control, or procurement authority.

Thank you for your time and consideration.

Sincerely,



Kyle Swanson  
CEO/General Manager