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Clerk's Office

California Air Resources Board

1001 I Street, Sacramento, California 95814

Submitted via electronic commenting system <https://carb.commentinput.com/?id=sEBDrH8Ce>

Re: Comment Letter – Advanced Clean Fleets Regulation Amendments/Additional 15-Day Changes

Dear Members of the California Air Resources Board:

The Kings River Conservation District (District) was established in 1951 by a special act of the State legislature as a multi-county, special district formed to manage the lower Kings River watershed, serving all the constituents within 1.2 million acres in portions of Fresno, Kings and Tulare counties. Flood control, hydropower generation, and water resource management are primary responsibilities, as well as watershed and habitat enhancement.

While we recognize the State's long-term goals to reduce emissions and transition to cleaner vehicle technologies, the proposed amendments do not adequately account for the critical realities of emergency response operations—specifically flood patrol and flood fight activities in rural and remote areas.

Emergency Flood Response Requires Flexible Fleet Resources

Our District operates and maintains 140 miles of federal flood control levees. We are responsible for flood management and flood emergency response over a broad geographic region, often under rapidly evolving conditions. During high-water events, we must mobilize additional vehicles and equipment quickly, including rental vehicles and equipment, to ensure adequate staffing coverage for continuous 24-hour flood patrols. These vehicles are deployed on short notice, subject to availability and for limited durations, making it operationally impractical to rely exclusively on zero-emission vehicles within the current regulatory structure.

Lack of Charging Infrastructure in Remote Service Areas

Flood patrol routes and inspection areas are located in remote or rural environments where electric vehicle charging infrastructure is not available. Even where infrastructure exists within urban centers, it does not align with the operational footprint required for flood response. The inability to reliably recharge vehicles during extended patrol operations and emergency response presents a significant risk to public safety and compromises our ability to respond effectively.

Operational Risk and Public Safety Concerns

Strict compliance without meaningful exemptions or flexibility for emergency operations could hinder the timely deployment of personnel and resources during flood events. This introduces unacceptable risk to public safety and infrastructure. Public agencies performing emergency response activities must have the

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ability to deploy suitable vehicles and equipment without restriction when conditions demand immediate action.

Request for Regulatory Consideration

Given these constraints, we respectfully request that CARB:

- Provide clear exemptions for emergency response activities, including flood patrol and flood fight operations.
- Allow the use of rental and short-term fleet vehicles and other equipment for emergency purposes without triggering compliance penalties.
- Recognize the lack of charging infrastructure in rural and remote operational areas as a valid basis for extensions or exemptions.
- Continue engaging directly with affected agencies to ensure the regulation supports, rather than impedes, critical public safety functions through broad brush regulation changes.

We remain committed to reducing emissions where feasible and will continue to evaluate opportunities to integrate cleaner technologies into our fleet operations. However, regulatory requirements must be balanced with the operational flexibility required to fulfill our public safety mission. If you have any questions or would like to discuss these comments, please contact Charlotte Gallock at (559) 237-5567 extension 105 or cgallock@krcd.org.

Thank you for your consideration of these concerns.

Sincerely,



David M. Merritt,
General Manager

DD/CG/sjs