



# Consolidated Mosquito Abatement District

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June 10, 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 the Members of the California Air Resources Board:

We greatly 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 we cannot safely serve our communities unless emergency support vehicles are excluded from the regulation.

The Consolidated Mosquito Abatement District serves approximately 1,058 square miles in Fresno County. Our responsibility is to protect the community from nuisance and disease-transmitting mosquitoes, including response to elevated risk associated with West Nile virus and other vector-borne threats. During the mosquito-borne disease season, District vehicles travel an average of 1,900 miles per day to conduct surveillance, source reduction, and control activities critical to protecting public health, including nighttime spray missions to reduce the risk of West Nile virus transmission.

To prevent unnecessary loss of life 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 and 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.

The exemptions in the current regulation and draft amendments remain wholly and dangerously insufficient.

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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 vehicles that respond to, assist in and recover from disasters and emergencies, including: **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.**

Thank you for your consideration.

A handwritten signature in black ink, reading "Jodi J. Holeman". The signature is fluid and cursive, with the first name "Jodi" and last name "Holeman" clearly distinguishable.

Jodi J. Holeman  
District Manager  
Consolidated Mosquito Abatement District