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June 16, 2026

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

RE: Advanced Clean Fleets Second 15-Day Comment Period Response

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

Yuima Municipal Water District appreciates CARB's continued efforts to refine the Advanced Clean Fleets (ACF) regulation and the opportunity to comment on the second round of proposed modifications. As a uniquely small special district serving a rural agricultural community in northern San Diego County, YMWD has serious concerns that the current proposal could jeopardize our ability to deliver safe, reliable water services unless emergency response and critical support vehicles receive full exemptions.

We respectfully request that the Board reconsider the amendments as outlined in the April 14 letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties. These organizations collectively represent our state's 5,000 local agencies and 40 million residents.

The revised proposal is untenable, as it significantly raises costs, administrative burdens, and legal liabilities for local government agencies by extending fleet compliance obligations to private contractors.

Public Safety & Emergency Response

As currently designed, the proposed ACF modifications do not adequately address the operational realities of YMWD's service requirements, particularly in the context of emergency response.

According to the most recent CALFIRE map, approximately 100 percent of YMWD's service area is high or very high fire risk. Our responsibility during emergencies is to keep water flowing to customers and firefighters for the duration of the event. Yet when people evacuate, water continues to run through melted fixtures in destroyed homes—as we saw in the Palisades fires—draining the system. YMWD has a long history of emergency response experience to wildfires in 1989, 2003, and 2007. In particular, the 2007 fires burned a significant amount of YMWD's service area; damaging structures and agricultural crops that, in some cases, were never replanted. During these events, YMWD staff deploy across its 13,000-acre rural service area to shut off meters and maintain water pressure for firefighting. In addition to turning off meters, we manually operate valves, adjust water flow, switch water sources, and fuel standby generators to keep pump stations and local water supply wells operating.

YUIMA MUNICIPAL WATER DISTRICT

P.O. Box 177 • 34928 Valley Center Road • Pauma Valley, CA 92061
(760) 742-3704 • (760) 742-2069 • www.yuimamwd.com • e-mail yuima@yuimamwd.com

These critical tasks demand vehicles capable of long-distance travel, immediate deployment, and continuous operation—often when the electrical grid is unavailable. SDG&E's standard operating procedure for Public Safety Power Shutoffs (PSPS) during high-wind events compounds these challenges. In Pauma Valley, SDG&E routinely de-energizes lines for multiple days under red flag conditions to mitigate wildfire ignition risks. These outages frequently coincide with Santa Ana wind events—the precise periods when devastating wildfires are most likely to ignite and spread rapidly. Without reliable grid power for charging, zero-emission vehicles (ZEVs) cannot provide the immediate readiness and sustained performance of gasoline- or diesel-powered vehicles and generators.

The current CARB proposal places an artificial cap on resilience, allowing no more than 25 percent of our fleet to be exempt from conversion to ZEV. To serve our customers, YMWD operates 4 medium/heavy duty vehicles, but a 25 percent exemption limits YMWD to just 1 vehicle that we can rely on during emergencies and power outages. This dangerous cap ignores the realities we face. Emergencies don't wait for regulations, and they don't scale to fit an arbitrary percentage of the fleet. Reducing our usable emergency vehicles by 75 percent would endanger the communities we serve. California has already experienced devastating wildfires and extreme weather—constraints like this will dramatically magnify future disasters.

Local agencies cannot have their ability to respond capped, especially when major incidents require regionwide support. Fire trucks, ambulances, and police vehicles are exempt, but the water and wastewater vehicles that enable this emergency response—such as trucks that tow fuel to water pumps—are not. This directly impacts firefighters' ability to do their jobs.

The proposed ACF mandates are generating unnecessary challenges for local agencies in upholding essential services that Californians depend upon for their essential daily needs, as well as during emergencies and disasters. Vehicles that are categorically exempted from the regulations, similar to those specified in Part (c) of §2013 of Title 13 of the California Code of Regulations, must include support vehicles that respond to, assist in, and recover from disasters and emergencies, including water and sewer utility vehicles. These vehicles should be included without an arbitrary 25 percent cap. Emergencies do not conform to percentage-based limitations.

Regulatory Compliance: Private Contractor Fleets

The proposed amendments considerably broaden the responsibilities of local government agencies concerning private contractor fleets. YMWD depends on contracted fleets for emergency activities such as the delivery of portable generators, as well as construction activities, all of which are vehicles typically owned (or leased) and operated by private contractors who run their own business. By extending ACF compliance obligations to contractors hired by local government agencies, the proposal indirectly holds the government agency accountable for private contractual fleet composition and compliance deadlines beyond its direct control.

For YMWD, this change would have immediate practical and financial impacts. It is excessively burdensome to make water districts act as de facto regulators responsible for verifying emissions compliance and auditing contractor fleets. Contractors have already expressed concerns that these procurement requirements might reduce bidder participation, increase contract costs, or delay service delivery due to limited vehicle availability and insufficient charging or fueling infrastructure.

Additionally, the proposal unduly burdens local agencies by holding them accountable for private contractors' fleet compliance. YMWD relies on contractors for portable generator delivery, construction, and other emergency work. Extending ACF obligations creates uncontrollable liabilities, procurement challenges, reduced bidder participation, higher costs, and delays—all of which are particularly

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burdensome for a small district. Additional administrative requirements (audits, disclosures, recordkeeping) would impose untenable financial and legal strain.

In Summary

To safeguard emergency response, critical infrastructure, and public health, CARB should provide explicit, uncapped exemptions for emergency response and support vehicles (including water utility vehicles) and withdraw the expansion of local government responsibility over private contractor fleets.

Thank you for the opportunity to share these comments and for your ongoing engagement in these regulations. Should you or your staff require any additional information, please do not hesitate to contact me at 760-815-4261 or amy@yuimamwd.com.

Sincerely,



Amy Reeh
General Manager
Yuima Municipal Water District

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