



Twain Harte Community Services District

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June 12, 2026

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

SUBJECT: Advanced Clean Fleets 2nd 15-Day Comment Period Response

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

We appreciate the effort that has gone into the second 15-day comment period draft (June 1, 2026) of the Advanced Clean Fleets (ACF) regulations. The goals of the draft regulations are lofty and admirable; however, the reality remains that **Twain Harte Community Services District (THCSD) and many other critical local agencies will not be able to keep our communities safe unless emergency support vehicles are exempted.** The exemptions in the current regulation and draft amendments remain wholly and dangerously insufficient.

THCSD serves provides water, sewer, fire and park services to the small mountain community of Twain Harte where severe winter storms and extended power outages are normal during winter months. For example, in February, heavy snows and winds knocked down hundreds of trees, causing 6-day power outages and a nearly 3-week water supply outage. Our entire 8-vehicle water/sewer fleet was utilized around the clock to make sure our community continued to have access to water for drinking and sanitation (the human right to water) and for firefighting (house fires are more frequent during winter power outages when people must rely on wood stoves for heat). Our fleet also worked to prevent sewer overflows, which threaten public health and safety (these are more common during storms where stormwater infiltrates and overwhelms sewer lines). It would have been impossible to keep a ZEV fleet continuously charged and operational during this extended power outage and the proposed ACF amendments do not exempt most of our small water/sewer fleet as emergency vehicles. **With the proposed ACF amendments in place, we would not have been able to keep water flowing to our community or prevented sewer overflows, creating a serious public health and safety situation.**

To prevent unnecessary loss of life and property, we respectfully request:

Vehicles need to be categorically exempted from the ACF regulations in the same manner as those found in part (c) of § 2013 of title 13 of the California Code of Regulations, which include vehicles that respond to, assist in and recover from disasters and emergencies (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).

Please amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most. Public safety depends on it.

Thank you for your consideration,

TOM C. TROTT
General Manager