



VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

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June 11, 2026

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

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

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

We greatly appreciate the time and effort invested in preparing the second 15-day draft for public review and comment published June 1, 2026. While the goals of these regulations are commendable, the recent amendments still do not adequately address the exemption of vehicles supporting critical and emergency response, including vehicles under contract with state and local governments. Additionally, the language regarding the inclusion of private contract fleets creates ambiguity and implementation challenges for local agencies.

Valley Center Municipal Water District (VCMWD) provides water, wastewater, and recycled water services to domestic, agricultural, commercial, and tribal customers across approximately 101 square miles. This service area includes the unincorporated communities of Valley Center and surrounding areas north of Escondido in northern San Diego County. VCMWD operates and maintains an extensive infrastructure system, including transmission and distribution pipelines, storage reservoirs, pumping stations, and wastewater facilities.

VCMWD owns and operates a fleet of 48 vehicles, including 24 medium and heavy-duty trucks subject to the Advanced Clean Fleets (ACF) regulations. As a small public water agency, VCMWD maintains minimal redundancy within its fleet, with each vehicle assigned to a specific and critical operational role. These vehicles are essential to the provision of safe and reliable water service to more than 30,000 residents, and wastewater services to approximately 9,800 residents. They are also critical to maintaining effective emergency response capabilities.

Public Safety Power Shutoff (PSPS) events further underscore the critical need for reliable emergency response vehicles. During periods of extreme fire risk, electrical service to the Valley Center area may be de-energized for multiple days, directly impacting the District's ability to operate pumps, maintain system pressure, and deliver water for fire suppression. In these circumstances, VCMWD relies heavily on its fleet to deploy generators, fuel equipment, and personnel to sustain water and wastewater services throughout the system. Maintaining adequate water supply and pressure is essential to supporting the Valley Center Fire Protection District in protecting life and property during wildfire emergencies. Limitations on the availability or reliability of these vehicles during PSPS events would significantly compromise the District's emergency response capabilities and pose a direct risk to public safety.

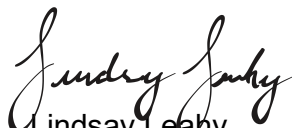
The proposed amendments significantly expand local agency responsibilities related to private contractor fleets. Public agencies rely on contractors for essential services such as waste and debris hauling, organics collection, and construction activities. Extending ACF compliance requirements to private contractor fleets creates substantial uncertainty for services agencies have relied upon for decades. When compliance interpretations can change from year to year, agencies cannot effectively plan operations, make sound contracting decisions, or ensure responsible use of ratepayer funds.

To prevent unnecessary loss of life and property in the communities we serve, we respectfully request reconsideration of the amendments outlined in the October 7th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, which collectively represent over 5,000 local agencies and 40 million residents.

Local agencies like ours are committed to advancing the State's climate and emissions goals. However, the ACF mandates and aggressive compliance timelines present significant operational challenges and the exemptions in the current regulation and draft amendments remain wholly and dangerously insufficient. Without targeted amendments, these requirements will limit the ability of water and wastewater agencies to maintain essential services, particularly during emergencies and disaster response when reliability, flexibility, and rapid deployment are critical.

Vehicles that respond to emergencies must be categorically exempted from these regulations, consistent with subdivision (c) of § 2013, Title 13 of the California Code of Regulations. This exemption should include vehicles used to respond to, assist in, and recover from disasters and emergencies, including water utility, flood protection, sewer, electric utility, disease and vector control vehicles. We respectfully request that the ACF exemptions be revised to ensure vehicles supporting critical and emergency services can continue operating in a safe, efficient, and reliable manner.

Sincerely,


Lindsay Leahy
General Manager