



June 9, 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 Members of the California Air Resources Board:

We appreciate the time and effort that has gone into the second 15-day comment period draft of the Advanced Clean Fleets (ACF) regulation, published on June 1, 2026, for public comment. While we recognize and support the State's broader climate and emissions reduction goals, the practical impacts of this regulation on local agencies must be carefully considered. As currently written, the regulation creates serious operational, financial, and emergency response challenges for agencies that provide essential public services. The reality remains that local agencies cannot safely and reliably serve their communities unless emergency support vehicles are excluded from the regulation.

Mission Springs Water District provides essential drinking water and wastewater services across approximately 135 square miles, serving residents, businesses, schools, healthcare facilities, public agencies, and other critical community assets in Desert Hot Springs and surrounding areas. Our community depends on us to maintain continuous operations under all conditions, including extreme heat, high winds, earthquakes, flooding, power outages, fires, and other emergencies or disasters. During these events, our vehicles must be able to travel long distances across a broad service area, operate for extended periods of time, access remote facilities, haul equipment and materials, and remain in service for many consecutive hours without interruption.

In Desert Hot Springs, these concerns are especially significant. Our service area includes disadvantaged and severely disadvantaged communities, where residents are already facing substantial economic pressures. The significant cost of electric vehicles, charging infrastructure, electrical upgrades, fleet replacement, and long-term maintenance would ultimately place additional financial strain on local agencies and the ratepayers we serve. For communities already burdened by high costs of living, limited resources, and infrastructure needs, these added costs are not minor. They directly affect the affordability and reliability of essential public services.

The transition to cleaner fleet technologies must be realistic, achievable, and sensitive to the unique needs of communities like Desert Hot Springs. Unlike many urban agencies with smaller service areas, greater infrastructure capacity, and more readily available charging options, our District must maintain reliable operations across a large desert service area where extreme temperatures, emergency conditions, and long response distances are routine concerns. In an emergency, our first obligation is to protect public health and safety by keeping water and wastewater systems operational. Vehicles used for those purposes cannot be limited by uncertain charging availability, reduced range under heavy loads, long charging times, or infrastructure that may be unavailable during power outages or disaster conditions.

To help protect life and property in Desert Hot Springs and the communities we serve, we respectfully ask that you reconsider the amendments requested 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 thousands of local agencies throughout California that are responsible for delivering the core public services residents depend on every day and during emergencies.

Local agencies like ours are not seeking to avoid progress. We support responsible efforts to reduce emissions and modernize public fleets where the technology, infrastructure, funding, and operational conditions make that transition feasible. However, the ACF regulation must be practical, flexible, and protective of essential public services. As written, the current exemptions remain dangerously insufficient and create unnecessary risk for agencies responsible for maintaining critical water, wastewater, emergency response, and recovery operations.

A one-size-fits-all approach does not adequately account for the realities faced by local agencies serving disadvantaged desert communities. Public water and wastewater utilities must be able to respond immediately and reliably when wells, booster stations, reservoirs, lift stations, sewer mains, treatment facilities, or other critical infrastructure are threatened or out of service. Delays in response can quickly create public health risks, service interruptions, property damage, environmental impacts, and broader emergency conditions. Regulations intended to advance environmental goals should not unintentionally compromise the ability of essential service providers to respond when communities need them most.

Consistent with 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 with, and support recovery from disasters and emergencies. This should include water utility vehicles, sewer utility vehicles, flood protection vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

Providing this exclusion would preserve the ability of local agencies to protect public health, safety, property, and the environment while continuing to work toward the State's climate goals in a responsible and achievable manner. For communities like Desert Hot Springs, this flexibility is not merely a preference. It is necessary to ensure that essential services remain reliable, affordable, and available when residents need them most.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Macy".

Brian Macy, MPA, P.E.
General Manager
Mission Springs Water District