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June 16, 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 the Members of the California Air Resources Board:

Thank you for the opportunity to comment on the Advanced Clean Fleets (ACF) 2nd 15-day draft published June 1, 2026. While the intent behind these regulations is understandable, the recent amendments still fall short in adequately addressing the exemption of vehicles that support critical and emergency response operations, including those contracted by state and local governments. Additionally, the wording related to inclusion of private contract fleets introduces ambiguity and creates implementation challenges for local agencies. Our water and wastewater agency must have access to mission-critical vehicles whenever needed, including vehicles under contract to support reliable essential public services that protect communities.

Dublin San Ramon Services District (DSRSD) provides water and wastewater services to approximately 200,000 residents and businesses in Alameda and Contra Costa counties. Our community relies on us for water and wastewater services 24/7, and we must also be prepared to provide these critical services during emergencies such as earthquakes and fires. Several vulnerabilities arise when relying solely on electrically powered vehicles. Power outages are common during emergencies, and uninterrupted access to fully operational fleet vehicles is essential. Field operations staff must be assured that all fleet vehicles will remain dependable under any emergency conditions.

Vehicles that should be categorically exempt from the regulations—consistent with the exemptions listed in part (c) of § 2013, title 13 of the California Code of Regulations—include those used to respond to, assist with, and recover from emergencies and disasters. These include water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention and fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

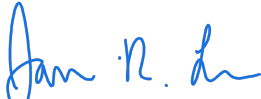
The current amended draft of the ACF proposed on June 1 has now altered the definition of “Fleet Owner” to state “...the person or entity who owns, rents, leases, operates or contracts for the operation of the vehicles comprising the fleet”. By including all vehicles contracted for one year or longer in a public agency’s inventory that is subject to ACF compliance, CARB greatly expanded the stakeholder group impacted by the regulation. The expansion of the “Fleet Owner” definition puts public agencies in the position of enforcing the requirements of the ACF regulation on CARB’s behalf on all entities for which they contract to perform public services (for one year or more). However, public agencies have limited to no control or authority over contracted fleet vehicles, and exercising this type of direct control requires an approved waiver of preemption request from the EPA under the Clean Air Act. The changes to the “Fleet Owner” definition have created an exceptionally high level of uncertainty for those services and a significant increase in potential for system failure. Public agencies may be abruptly and unexpectedly unable to rely on those essential contracts as a result of these changes and cannot immediately fill the gap in those services due to the challenges outlined.

Additionally, we are in agreement with the detailed concerns and proposed changes made by the California Association of Sanitation Agencies (CASA) in their letter to you responding to this 2nd 15-Day Comment Period.

CASA has commented repeatedly on critical elements of the ACF regulation that will undermine the resilience of public services. Society relies on water and wastewater services as they underpin safety, security, and the economy. The ACF regulation as written today will decrease reliability of these services. Without the proper evaluation of impacts to services and appropriate amendments to the language to ensure reliability remains paramount, implementation will impede public agencies from protecting California citizens.

We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "Jan R. Lee", with a stylized flourish at the end.

Jan R. Lee
General Manager