



South Tahoe Public Utility District

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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 Members of the California Air Resources Board,

Thank you for the time and effort that has gone into the 15-day comment draft. While the goals of these regulations are commendable, the reality remains that we cannot safely serve our community unless emergency support vehicles are exempted.

At South Tahoe Public Utility District, we supply drinking water and provide sewage collection, treatment, and export to protect Lake Tahoe's delicate ecosystem. Managing this complex operation requires an uncommon environmental sensitivity. Our community relies on us for reliable and safe water supply and sewage collection, even during blizzards and extended power outages. Our operators work during extreme winter conditions and power outages to refuel generators to keep our 80 water and sewer field stations operating. Failure means a sewage spill into Lake Tahoe.

The Porter-Cologne Act requires that all recycled water be exported out of the Tahoe Basin. That means that every drop of water that goes down the drain in South Lake Tahoe, must be pumped 26 miles up and over a mountain pass. As such, we rely on a large pump station to export over 3.9 million gallons per day of recycled water. We need to be able to always access this facility. Cold temperatures, deep snow, and frequent power outages make reliable transportation critical for our operations.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the April 14th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing our state's 5,000 local agencies and 40 million residents.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current ACF regulation and its ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating untenable and unnecessary challenges in complying while maintaining the many critical services Californians rely upon for their most essential daily needs as well as during emergencies and disasters.

The exemptions in the current regulation and draft amendments remain wholly and dangerously insufficient.

In the same manner as 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 in and recover from disasters and emergencies, including: water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, and fire protection vehicles.

Thank you for your consideration,



Paul Hughes
General Manager