

June 15, 2026

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

RE: Proposed Second 15-Day Amendments to the Advanced Clean Fleets and Low Carbon Fuel
Standard Regulations

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

On behalf of Soquel Creek Water District (District), I appreciate the opportunity to provide comments on the proposed Second 15-Day Amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard regulations.

The District supports California's efforts to reduce emissions and advance long-term climate and air quality goals. As a public water agency, we also have a fundamental responsibility to provide safe, reliable drinking water and protect public health, including during emergencies and disasters. We remain concerned that, without additional clarification for emergency response and critical public-service vehicles, the proposed amendments could create significant challenges for agencies responsible for essential public services.

Background

Soquel Creek Water District serves small communities along the Monterey Bay coastline and throughout the Santa Cruz Mountain foothills, specifically portions of the City of Capitola, and unincorporated areas of Santa Cruz County (Soquel, Seacliff, Aptos, Rio Del Mar, and La Selva Beach). Our service area includes coastal, urban, and foothill environments where emergency access, terrain, power reliability, and infrastructure limitations can make response conditions difficult. During wildfires, storms, power outages, landslides, and other emergencies, District crews must be able to respond immediately to restore water service, maintain water quality, support firefighting efforts, operate treatment facilities, and protect critical groundwater infrastructure.

Need for Clarity Regarding Contractor Fleet Provisions

The District is concerned about how the proposed contractor fleet provisions may be interpreted and applied. Water agencies rely on professional services consultants and contractors for emergency repairs, specialized utility construction for capital improvement projects, excavation, equipment transport, electrical work, and other critical services. If the regulation is interpreted to apply broadly to any consultant or construction contractor performing work for a public agency, it could significantly increase project costs, reduce the pool of available contractors, delay urgent repairs and infrastructure

improvements, and create substantial administrative burdens for both public agencies and the businesses that support them.

The District does not believe these consequences reflect the intended purpose of the regulation. We respectfully request that CARB provide clear and specific language regarding the scope and applicability of these provisions so they are not interpreted more broadly than intended.

Water Utilities Are Critical Public Safety Infrastructure

Water utility emergency-response vehicles are not discretionary assets. They are essential tools used to protect public health and safety, maintain reliable water service, and support emergency response and recovery. These vehicles must be capable of operating for extended periods, reaching remote or infrastructure-constrained areas, transporting emergency equipment, and supporting critical operations when power, communications, roads, and other systems may be compromised.

Delays in water system response can have serious consequences, including prolonged water outages, reduced fire-suppression capability, increased property damage, economic disruption, and heightened public health risks. Reliable access to drinking water is fundamental to emergency preparedness, emergency response, and community resilience.

For these reasons, water utility emergency-response vehicles should receive the same practical consideration as vehicles used by police, fire, and emergency medical services. Like those agencies, water utilities provide essential public safety functions and must be able to respond immediately and operate under difficult conditions when communities need us most.

Requested Action

The District strongly supports the amendments requested by the California Special Districts Association, League of California Cities, and California State Association of Counties, which collectively represent local agencies throughout California.

Accordingly, the District respectfully requests that CARB:

1. Reconsider or further clarify the proposed contractor fleet provisions to ensure they are not interpreted in a manner that unintentionally expands compliance obligations to contractors performing essential services on behalf of public agencies; and
2. Adopt a categorical exemption, consistent with Section 2013(c) of Title 13 of the California Code of Regulations, for vehicles that respond to, assist in, and recover from emergencies and disasters.

This exemption should expressly include water utility vehicles and other critical public-service vehicles, including flood protection, sewer, electric utility, fire prevention and protection, search and rescue, and vector control vehicles.

The District remains committed to California's climate goals and supports fleet electrification where operationally feasible. However, the transition must be implemented in a way that preserves emergency

response capacity, protects public health and safety, and recognizes the operational realities of critical public infrastructure.

Thank you for your consideration and for your continued engagement with local agencies working to balance environmental progress with the uninterrupted delivery of essential public services. Should you or your staff require additional information, please contact me at MelanieS@soquelcreekwater.org or (831) 475-8500 ext. 153.

Respectfully submitted,



Melanie Mow Schumacher, P.E.
General Manager
Soquel Creek Water District