

Vista Irrigation District (Brett Hodgkiss)

See attached for comments on the Proposed Amendments to the Advanced Clean Fleets Regulations.



1391 Engineer Street • Vista, California 92081-8840
Phone (760) 597-3100 • Fax: (760) 598-8757
www.vidwater.org

Board of Directors

Marty Miller, *President, Division 1*
Frank Nuñez, *Division 2*
Peter Kuchinsky II, *Division 3*
Patrick H. Sanchez., *Division 4*
Jo MacKenzie, *Division 5*

Administrative Staff

Brett L. Hodgkiss
General Manager
Ramae A. Ogilvie
Board Secretary
Elizabeth A. Mitchell
General Counsel

June 4, 2026

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

Re: Advanced Clean Fleets 15-Day Comment Period Response

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

We greatly appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While the goals of these regulations are laudable, the reality remains that we cannot safely serve our communities unless emergency support vehicles are exempted.

Vista Irrigation District (District) serves over 135,000 residents across an area exceeding 32 square miles. The communities that it serves rely on the District and its water distribution system for potable water and fire flow. During emergencies, District vehicles may travel hundreds of miles in a single day and operate for more than 24 hours to support personnel and equipment essential for maintaining water system reliability.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the April 14, 2026 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 Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating 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.

Vehicles that that need to be categorically exempted from the regulations in the same manner as those found in part (c) of § 2013 of title 13 of the California code of regulations include water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles. When natural disasters and emergencies happen, these vehicles play a vital role in a local agency's ability to respond quickly, provide needed assistance and support recovery efforts.

These exemptions are even more critical now as several major manufacturers of medium and heavy-duty vehicles, such as Ford and General Motors, have announced plans to scale back production of electric vehicles. 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.

Regards,

A handwritten signature in blue ink, appearing to read "Brett Hodgkiss".

Brett Hodgkiss
General Manager

cc: California Special Districts Association