



Tehachapi-Cummings County Water District

Our Water • Our Future

June 12, 2026

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

Officers:

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Jonathan Hall, *Vice President*
Thomas P. Neisler, *General Manager*
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RE: Advanced Clean Fleets 2nd 15-Day Comment Period Response

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

We greatly appreciate the time and effort that has gone into the second 15-day comment period draft of the Advanced Clean Fleets (ACF) regulation published June 1, 2026, 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 excluded from the regulation.

The Tehachapi-Cummings County Water District We serves a community spanning 415 square miles. Our community relies on us for imported water, local groundwater supply, basin management, and flood control operations. During emergencies, our vehicles must travel the expansive boundaries of our district, including many miles of off-road travel. Our vehicles run for multiple hours at a time, in all weather conditions, and at all times of the day/night as the emergency support and/or repair situations dictate.

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.

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 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, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles.

Thank you for your consideration,

Thomas P. Neisler
General Manager - TCCWD