



BOARD OF DIRECTORS

David A. Drake
President

Inki K. Welch
Vice President

Evan R. Wahl
Treasurer

Thomas M. Kennedy
Director

Kenneth A. Hoving
Director

STAFF

Jeffrey J. Umbrasas
General Manager

Wanda J. Cassidy
Clerk of the Board

GENERAL COUNSEL

Nossaman LLC

CONTACT

1920 North Iris Lane
Escondido, CA 92026

760.745.5522
Telephone

760.745.4235
Facsimile

Rinconwater.org
Website

OUR VALUES

- Resource Stewardship
- Integrity
- Continuous Improvement
- Proud to serve the Greater Escondido Valley since 1954

June 15, 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:

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.

At Rincon del Diablo Municipal Water District, we serve a community spanning 42 square miles. Our community relies on us for water, wastewater, and fire protection services. During emergencies, our vehicles must travel to provide essential services, including operation and repair of water and wastewater infrastructure, which may require our vehicles to operate continuously for multiple days in challenging conditions that may not allow access to electric vehicle charging infrastructure.

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

Thank you for your consideration,

Jeff Umbrasas
General Manager