

## Tuolumne Utilities District (Abby Parcon)

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.

Tuolumne Utilities District serves a geographically dispersed rural service area spanning approximately 1,400 square miles, encompassing mountainous and remote terrain. Our customers rely on the District for continuous water and wastewater services that are essential to public health, fire protection, and emergency response. During emergency events—including wildfires, severe storms, flooding, and extended power outages—District vehicles must travel long distances to access critical infrastructure and are required to operate continuously for extended periods, often away from the main TUD yard for 12-24 hours at a time, under rugged terrain, limited access, and adverse weather conditions. The reliability, range, and refueling flexibility of these vehicles are critical to maintaining uninterrupted service and protecting life and property during emergency response 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 and wastewater (sewer) utility vehicles.

Thank you for your time and consideration,

Don Perkins  
General Manager



# TUOLUMNE UTILITIES DISTRICT

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June 3, 2026

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

## **RE: Advanced Clean Fleets 2<sup>nd</sup> 15-Day Comment Period Response**

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

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