



HUMBOLDT BAY MUNICIPAL WATER DISTRICT

828 Seventh Street • Eureka, California 95501-1114

PO Box 95 • Eureka, California 95502-0095

Office 707-443-5018 • Fax 707-443-5731

Essex 707-822-2918 • Fax 707-822-8245

Email: Office@hbmwd.com

Website: www.hbmwd.com

BOARD OF DIRECTORS

MICHELLE FULLER, PRESIDENT

SHERI WOO, VICE-PRESIDENT

J. BRUCE RUPP, DIRECTOR

NANCY STEVENS, DIRECTOR

TOM WHEELER, DIRECTOR

GENERAL MANAGER

MICHIKO M. MARES

April 9, 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 Liane Randolph and Members of the California Air Resources Board:

The Humboldt Bay Municipal Water District (HBMWD) appreciates the opportunity to provide comments on the 15-day draft updates to the Advanced Clean Fleets (ACF) regulation. While we support California's climate goals and efforts to reduce emissions, it is critical that implementation of these regulations does not compromise the ability of local agencies to safely and reliably serve their communities.

HBMWD provides wholesale water supply for municipal customers throughout the Humboldt Bay region. Our system is critical to public health and safety, and our operations require reliable, responsive, and durable fleet vehicles capable of operating under a wide range of conditions. During emergencies—including wildfires, severe storms, earthquakes, and power outages—our vehicles must operate continuously, often in remote or hazardous environments, to ensure uninterrupted water service and protect critical infrastructure.

At present, zero-emission vehicle (ZEV) technology and supporting infrastructure are not yet sufficient to fully meet the operational demands of water utility and emergency response functions. The ACF regulation, as currently structured, creates significant challenges for local agencies attempting to comply while continuing to provide essential services.

We respectfully request that CARB incorporate additional flexibility into the ACF regulation, consistent with recommendations submitted by statewide local government organizations including the California Special Districts Association, League of California Cities, and California State Association of Counties. Specifically, we request that CARB:

- Expand categorical exemptions to include vehicles that respond to, support, and recover from emergencies and disasters, including water utility vehicles and other critical infrastructure support vehicles
- Provide additional compliance flexibility where ZEV technology or infrastructure is not yet feasible
- Ensure that local agencies are not required to procure vehicles that cannot safely or effectively perform required functions

Local agencies like HBMWD remain committed to doing our part to achieve the State's climate and emissions goals. However, these goals must be balanced with the responsibility to protect public health, safety, and welfare. Ensuring that emergency response and essential service vehicles remain operationally viable is critical to the communities we serve.

We respectfully urge CARB to revise the ACF regulation to address these concerns and provide the flexibility necessary for local agencies to continue delivering critical services without disruption.

Thank you for your consideration.

Sincerely,

Michiko M. Mares, P.E.
General Manager