



# Twain Harte Community Services District

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April 7, 2023

Clerk of the Board  
California Air Resources Board (CARB)  
1001 I St., 6<sup>th</sup> Floor  
Sacramento, Ca 95814

SUBMITTED VIA EMAIL: [zevfleet@arb.ca.gov](mailto:zevfleet@arb.ca.gov)

**SUBJECT: Comments on Draft Advanced Clean Fleets (ACF) Regulation**

Dear California Air Resources Board (CARB):

Twain Harte Community Services District (THCSD) appreciates the opportunity to provide comments on CARB's March 23, 2023, draft ACF Regulation. While the latest ACF regulation reflects some of the exemptions and extensions previously requested, THCSD remains seriously concerned with the limited exemptions provided and requests that CARB revise the ACF regulation to incorporate our below comments.

THCSD provides water, sewer, fire and park services to approximately 1,600 customers and businesses in the small, Sierra Nevada town of Twain Harte in Tuolumne County. Severe weather and natural disasters (i.e. blizzards, atmospheric rivers, windstorms, wildfires, floods, landslides, etc.) are common in THCSD's service area. These events frequently cause prolonged power outages and emergency disruption of our services that are critical to public health and safety. To protect the public, THCSD's vehicles and equipment (vacuum trucks, offroad-equipped service trucks, excavators, etc.) must be capable of responding to these events 24 hours per day, 365 days per year. Additionally, these vehicles and equipment often need to remain operational in the field for many hours or days with remote fueling until the emergency has been addressed and public health and safety has been restored.

The ACF Regulation exempts emergency vehicles currently defined in the California Vehicle Code, but this definition is limited and must be expanded to include all vehicles and equipment needed to repair and maintain water and wastewater facilities, as well as vehicles used to perform wildfire mitigation activities. These vehicles are particularly critical during and following the very events that could interrupt the ability of zero emission vehicles (ZEV) to operate.

THCSD appreciates the challenges that CARB faces in implementing the draft ACF regulation and supports the goals behind the regulation; however, the current draft ACF regulation prevents public agencies like ours from being able to provide services that are critical to the public's health and safety. Please consider expanding the definition of exempt emergency vehicles to keep California's public safe.

Sincerely,

TOM C. TROTT  
General Manager