



California Animal Welfare Association

Promoting Excellence in Animal Care, Sheltering, and Law Enforcement since 1909



Public Comment – Clean Fleet Regulations Exemption Request for Animal Control Vehicles

Submitted on behalf of the Undersigned California Animal Care and Control Agencies

September 15, 2025

To the Members of the California Air Resources Board:

On behalf of animal control agencies across California, CalAnimals respectfully petitions your Board to recognize the essential role Animal Control Officers (ACOs) and Humane Law Enforcement Officers

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(HLEOs) play in preserving our communities' public safety and include the vehicles used by these officers alongside other emergency response and law enforcement vehicles as exempt from the Clean Fleet standards.

Our fleets overwhelmingly rely on vehicles categorized as Class 2b or larger which, under current regulations, must be Zero-Emission(ZEV) or Near-Zero Emission (NZE) vehicles if purchased new. While we appreciate the temporary flexibility provided by the existing vehicle credit program, the termination of that program in January 2027 presents very serious challenges with regard to the ability of these fleets to continue to fulfill their essential public safety role.

We urge you to consider the following factors:

- **Public Safety and Emergency Response Role of ACOs & HLEOs:** While ACOs and HLEOs are not classified as peace officers, and hence vehicles utilized by them are not exempt from Clean Fleet requirements, they are vested by State law with many of the same authorities – including the power of arrest, the authority to serve search warrants and carry firearms. ACOs and HLEOs often work in coordination with traditional law enforcement, fire departments, and emergency services agencies to respond to public safety incidents, rescue scenarios, and community disaster events.

We are frontline responders during wildfires, floods, and evacuations. In many jurisdictions our vehicles routinely cover hundreds of miles in a single shift. They must be able to traverse difficult terrain and remain in continuous operation in order to provide a safe and humane environment and uninterrupted ventilation for transported animals.

Critically, ACO & HLEO vehicles must be dependable and able to operate throughout the duration of emergencies or disasters which may disrupt electrical service.

- **Lack of Viable Alternatives:** Despite rapid advances in clean vehicle technology, there remain no viable ZEV/NZE models in the Class 2b and Class 3 categories that fully meet the operational needs of animal control agencies. Similarly, reducing to a lower class vehicle is not an option for most agencies since standard animal containment boxes are not manufactured to fit on those smaller vehicle frames, nor do those vehicles have an equivalent carrying/tow capacity.
- **Unintended Operational and Fiscal Impacts:** The inability to procure compliant vehicles that meet operational requirements will limit our capacity to respond effectively to both routine service and emergency calls. It is likely that agencies would need to purchase multiple vehicles just to replace the functional capabilities of a single ACO or HLEO unit currently in service; maintaining those additional vehicles at the same level of response readiness would also require additional personnel.

Animal control agencies are committed to sustainability and reducing our environmental footprint. However, the current regulatory framework does not yet reflect the operational realities of our profession. We therefore urge CARB to formally classify animal control and humane law enforcement vehicles as exempt under the same provisions that currently apply to other law enforcement and



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emergency response vehicles, until such time as viable ZEV/NZE alternatives meeting both performance and safety standards for our work are available.

Thank you for your consideration.

Sincerely,

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