

City of Sacramento (William Mancilla)

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September. 25. 2025  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Recommendation for Amendments to the Advanced Clean Fleets (ACF) Regulation  
Regarding Emergency Vehicle Exemptions

Dear Members of the Board,

I respectfully submit the following recommendation regarding the current amendments to the Advanced Clean Fleets (ACF) regulation (Resolution 25-9).

While the ACF regulation provides important milestones for transitioning California's fleets toward zero-emission vehicles (ZEVs), it is critical to address the unique role of emergency vehicles operated by fire departments, police departments, and other first responder agencies. These vehicles provide essential public safety services and must be available under all conditions. Recognizing this, I urge CARB to adopt a specific measure for emergency vehicles across all vehicle classes to be mandated to be either Hybrids or PHEVs.

Emergency vehicles, particularly fire engines and law enforcement patrol units, are among the highest contributors to idling and driving emissions because of their operational nature across local government agencies —running equipment on-scene or maintaining readiness during extended standby. These emissions not only undermine California's climate and air quality goals but also disproportionately impact overburdened communities who often live nearest to emergency response corridors.

Therefore, I strongly recommend that CARB include regulatory language requiring that all newly purchased emergency vehicles, while exempt from full ZEV requirements, must at minimum be hybrid-electric or plug-in hybrid-electric vehicle . This approach:

1. Reduces Waste Emissions and Idling: Hybrid and plug-in hybrid drivetrains allow equipment operation and vehicle readiness without continuous combustion idling, cutting unnecessary NOx, PM, and GHG emissions.
2. Supports Public Health Goals: Reduced idling directly lowers exposure risks to frontline responders and the communities they serve, aligning with CARB's mission to protect public health.
3. Preserves Emergency Readiness: Hybrid and plug-in hybrid platforms retain

conventional fueling capabilities while integrating cleaner technology, ensuring no compromise in vehicle reliability during emergencies or power outages.

4. Provides a Pathway Toward Full ZEV Adoption: By requiring hybrids and PHEVs as an interim step, California builds operational familiarity and infrastructure that will facilitate a smoother long-term transition to full ZEV emergency vehicles as technologies mature, while also creating financial savings for local governments.

In conclusion, I respectfully request that the Board adopt amendments to the ACF regulation that:

- Require that exempted vehicles must be procured as hybrid-electric or plug-in hybrid-electric models.

( I have provided a detailed analysis on efficiency ratio between different fuels which I urge CARB staff to consider when designating emissions reductions goals).

This balanced approach maintains California's commitment to clean air and climate protection while ensuring that essential emergency services remain reliable and uncompromised.

Thank you for your continued leadership in advancing California's clean transportation future. I appreciate your consideration of this recommendation and stand ready to provide additional data or operational insights from the City of Sacramento's fleet management perspective.

Sincerely,

William Mancilla  
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City of Sacramento, Fleet Division.