



Creating Efficient, Sustainable, Safe Fleets

GENERAL CORRESPONDENCE

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California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: NAFA Comments on Permanent Adoption of Emergency Vehicle Emissions Regulations (15-Day Notice)

Dear Chair Sanchez and Members of the Board:

On behalf of the NAFA Fleet Management Association (NAFA), we appreciate the opportunity to provide comments on the proposed permanent adoption of the Emergency Vehicle Emissions Regulations and associated 15-day modifications.

NAFA and its members, including fleets operating across California, support the objective of advancing emissions reductions across all vehicle categories, including emergency response fleets. As these provisions move from emergency adoption to permanent regulatory structure, our comments are intended to reflect the operational realities of fleets responsible for critical public safety and service delivery functions.

We have framed these comments with a focus on implementation stability, operational clarity, and alignment with the conditions under which these fleets must perform.

NAFA represents more than 3,200 fleet professionals managing over 4.8 million vehicles traveling more than 84 billion miles annually. Our members operate across public and private sectors, including counties, cities, special districts, utilities, public safety agencies, educational institutions, and commercial operations. In California, these fleets are responsible for delivering essential services every day—responding to emergencies, maintaining infrastructure, restoring utilities, transporting students, and supporting economic activity across urban, suburban, and rural communities.

We recognize the importance of ensuring that California's climate leadership is matched by implementation that is durable across regions, fleet types, and economic conditions, particularly as these policies move from emergency adoption into permanent regulatory structure.

At this stage, the central issue is not the direction of policy, but the conditions under which that policy is implemented.

Implementation Under Legal and Regulatory Uncertainty

The context in which these regulations are being finalized has changed materially. The current framework incorporates conditional regulatory pathways that depend on the outcome of ongoing federal actions and judicial review. As a result, fleets are being asked to plan and make capital decisions under conditions where the applicable compliance framework may change.

This introduces a level of uncertainty that is difficult to reconcile with fleet procurement, infrastructure planning, and service delivery.

For fleets, the issue is not regulatory intent, but operational clarity. A compliance structure that depends on future legal determinations creates ambiguity in near-term decision-making, particularly where multiple potential regulatory pathways may apply.

Regulatory Stability and Procurement Timing

Fleet procurement operates on multi-year timelines. It is common for procurement processes to begin 12 to 24 months before vehicle delivery, with infrastructure deployment requiring similar or longer timelines due to permitting, interconnection, and construction requirements.

Under these conditions, fleets must make capital decisions well in advance of delivery, often without the ability to adjust once contracts are executed.

When regulatory applicability may shift based on future court outcomes or evolving federal determinations, fleets face the risk that decisions made in good faith under current guidance may later be misaligned with the applicable compliance framework.

In practice, this can lead to delayed procurement, increased costs, and reduced confidence in forward planning.

For public-sector fleets, these risks extend beyond compliance to service delivery. Delays in vehicle replacement or uncertainty in infrastructure deployment can affect the ability to maintain roads, restore utilities, respond to emergencies, and deliver essential public services.

Given the scale of fleets represented by NAFA members, these conditions affect not isolated procurements, but system-wide planning decisions across thousands of vehicles and multiple budget cycles.

Risk Allocation Under Conditional Compliance Frameworks

In the current structure, a significant portion of implementation risk is borne by fleet operators, particularly public-sector fleets, who have limited ability to influence vehicle availability, infrastructure deployment timelines, or the outcome of federal legal processes.

In effect, the current structure transfers compliance and timing risk from manufacturers and regulatory design to fleet operators, who have limited ability to influence vehicle availability, infrastructure readiness, or legal outcomes.

A municipal fleet responsible for emergency response must ensure that vehicles are available, reliable, and capable of operating under all conditions, including extended use and off-grid scenarios. A utility fleet must maintain the ability to respond to outages under conditions where infrastructure may be compromised. A public works fleet must procure vehicles capable of performing specialized functions across varied terrain and operating conditions.

These are representative conditions across emergency and public-service fleet operations. They represent the baseline operating conditions for fleets across California.

Because these responsibilities are carried out by counties, cities, special districts, and utilities, implementation of these regulations is, in practice, a state-local partnership. Its success depends on alignment between regulatory expectations and operational capacity.

These conditions are consistently reflected across counties, cities, special districts, and utilities responsible for delivering essential services under diverse operating conditions.

Aligning Implementation with Operational Reality

NAFA's members are actively engaged in fleet modernization and are committed to deploying lower-emission and zero-emission technologies where those technologies can reliably meet operational needs.

However, implementation mechanisms must reflect real-world conditions. A fleet should not be required to procure a vehicle that cannot meet its duty cycle, nor should it be penalized for continuing to operate equipment that remains functionally necessary and within its useful life.

Similarly, fleets that have entered into procurement decisions in good faith based on available regulatory guidance should have confidence that those decisions will remain valid over time.

Recommendations for Durable Implementation

To support effective and sustained implementation, NAFA offers the following considerations:

First, regulatory stability is essential. CARB should provide clear guardrails ensuring that fleets are not required to shift compliance pathways after procurement decisions have been made in good faith under an existing regulatory framework.

Second, CARB should consider establishing a compliance safe harbor for fleet procurement decisions. Vehicles procured in alignment with the regulations in effect at the time of purchase should be deemed compliant for their useful life, regardless of subsequent regulatory or judicial changes.

Third, transparency should be strengthened. Fleets require clear, accessible information regarding applicable compliance pathways, especially in cases where regulatory applicability may depend on external legal outcomes. Clear guidance, standardized compliance tools, and accessible verification resources will reduce uncertainty and improve decision-making.

Fourth, implementation should remain grounded in performance-based flexibility. Compliance pathways should allow fleets to meet emissions objectives through a range of solutions aligned with operational requirements, infrastructure availability, and cost considerations.

Finally, ongoing engagement with fleet operators is essential. The pace of regulatory change and evolving market conditions require continuous input from those responsible for implementation. A structured engagement mechanism would support more effective alignment between policy and operational reality.

NAFA would welcome the opportunity to work with CARB staff to further refine implementation pathways that align regulatory objectives with operational realities.

Conclusion

NAFA and its members remain committed to California's emissions and air quality goals. The progress made to date is significant, and the direction of travel is clear. The question at this stage is not whether fleets will transition, but whether implementation provides the stability, clarity, and operational alignment required to sustain that transition. With targeted adjustments focused on regulatory stability, transparency, and flexibility, California can continue to lead while ensuring that fleet modernization remains achievable, reliable, and effective across all communities.



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NAFA offers these comments in the spirit of supporting California's continued leadership while ensuring that implementation remains durable, equitable, and operationally grounded. NAFA stands ready to work with CARB and with public-sector partners across the state to support practical, durable implementation.

Respectfully submitted,

A handwritten signature in black ink that reads "Bill Schankel". The signature is written in a cursive, slightly slanted style.

Bill Schankel
CEO
NAFA Fleet Management Association

