



April 10, 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 Sánchez and Members of the California Air Resources Board:

On behalf of the California chapters of the American Public Works Association (APWA), we appreciate the significant time and effort that have gone into developing the 15-day proposed modifications to the Advanced Clean Fleets (ACF) regulation. We share the State’s commitment to improving air quality and reducing greenhouse gas emissions. However, we remain concerned that without additional targeted exemptions, these regulations will impair local agencies’ ability to deliver essential public services—particularly during emergencies.

Public works agencies serve communities that rely on uninterrupted access to critical infrastructure and services, including water, wastewater, stormwater, transportation, and emergency response support. During emergencies, public works vehicles must often operate continuously for extended periods, travel long distances, and perform under severe and unpredictable conditions. These operational realities cannot always be met with currently available zero-emission technologies or charging infrastructure.

To prevent unnecessary risks to public health, safety, and property, we respectfully urge the Board to adopt the amendments outlined in the October 7 letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties. These organizations collectively represent more than 5,000 local agencies serving over 40 million Californians, and their recommendations reflect the practical, on-the-ground challenges facing public agencies across the state.

Local agencies remain committed to advancing California’s climate goals and are actively transitioning fleets where feasible. However, the current ACF requirements create significant operational challenges, particularly for vehicles that support critical and emergency functions. Without appropriate flexibility, agencies may face untenable tradeoffs between regulatory compliance and the ability to protect public health and safety.

Accordingly, we request that the Board expand the ACF exemptions to align with those identified in Section 2013(c) of Title 13 of the California Code of Regulations. Specifically, exemptions should include

CALIFORNIA
Region VIII Chapters
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- [Central California](#)
- [Central Coast](#)
- [Monterey Bay](#)
- [Northern CA](#)
- [Sacramento area](#)
- [San Diego & Imperial Counties](#)
- [Silicon Valley](#)
- [Southern CA](#)
- [Ventura County](#)

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vehicles that respond to, support, and recover from emergencies and disasters, including but not limited to:

- Water utility vehicles
- Flood protection vehicles
- Sewer and wastewater utility vehicles
- Electric utility vehicles
- Fire prevention and fire protection vehicles
- Search and rescue vehicles
- Disease and vector control vehicles

These vehicles are indispensable to maintaining public safety and community resilience, particularly during natural disasters, extreme weather events, and other emergencies.

We respectfully request that the Board amend the ACF regulation to ensure that public works and emergency support vehicles can continue to operate reliably when Californians need them most.

APWA represents over 30,000 public works professionals across North America, with a robust and active presence throughout California. Our state chapters include:

- Central California Chapter
- Central Coast Chapter
- Monterey Bay Chapter
- Northern California Chapter
- Sacramento Area Chapter
- San Diego & Imperial Counties Chapter
- Silicon Valley Chapter
- Southern California Chapter
- Ventura County Chapter

Thank you for your consideration and for your continued partnership with local agencies in advancing both environmental and public safety goals.

Sincerely,



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