

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

April 13th, 2026

RE: Advanced Clean Fleets 15-Day Comment Period Response

Chair Lauren Sanchez and Members of the California Air Resources Board:

We greatly appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While the goals of these regulations are laudable, the reality remains that we cannot effectively serve our communities unless vehicles supporting wildfire prevention and land management are appropriately considered.

At Honey Lake Valley Resource Conservation District (HLVRCD) we serve a community spanning nearly 3 million acres of rural and high-fire-risk landscape. Our community relies on us for wildfire fuels reduction, forest health treatments, and watershed protection. This work is critical to reducing wildfire intensity and protecting lives, property, and natural resources before fires occur.

Our projects require vehicles to travel long distances across remote terrain and operate for extended periods in extreme heat, rugged conditions, and areas without access to fueling or charging infrastructure. These operational realities are not well aligned with current zero-emission vehicle capabilities or infrastructure availability in rural regions.

To prevent unnecessary risk to the communities we serve, we respectfully request reconsideration of the amendments outlined in the October 7th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing our state's 5,000 local agencies and 40 million residents.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. However, the current Advanced Clean Fleets (ACF) mandates create significant challenges for rural agencies attempting to comply while maintaining essential wildfire mitigation and land stewardship activities. In a county like Lassen, where wildfire risk is constant and increasing, the ability to carry out fuels reduction work efficiently is directly tied to community safety.

The State's Wildfire and Forest Resilience Task Force has set clear goals to significantly increase the pace and scale of fuels reduction and forest health treatments across California. The ACF mandates, as currently structured, risk slowing this critical work by limiting access to the reliable vehicles needed to implement projects in remote and high-risk areas. This creates a direct conflict between statewide climate policies and wildfire resilience objectives, making it more difficult to achieve the Task Force's goals of reducing catastrophic wildfire risk and protecting communities.

Additionally, it remains unclear whether and how the ACF mandate applies to contractors and project partners that HLVRCDC relies on to implement forest health and fuels reduction projects. Many of these partners operate heavy equipment, such as feller bunchers and other large machinery, that must be transported into remote project areas using heavy-duty trucks. At present, there are no practical zero-emission alternatives capable of reliably transporting this type of equipment under real-world rural conditions. Requiring such a transition prematurely would create significant barriers to project implementation and further slow the pace of critical wildfire mitigation work.

Further, HLVRCDC's existing fleet is new and fully functional, yet under the current ACF timelines may require replacement as early as 2030. As a Resource Conservation District, we rely entirely on grant funding to carry out our work and do not have the financial capacity to prematurely replace our fleet with zero-emission vehicles, particularly when the technology is not yet viable for our operational needs. Requiring early replacement of recently acquired equipment represents an inefficient use of public resources and creates an additional financial burden on small rural agencies.

Finally, all of HLVRCDC's fleet consists of large pickup trucks. These vehicles are essential for hauling equipment, accessing rugged terrain, and performing field-based work. We do not operate small passenger vehicles that could be readily replaced with currently available zero-emission alternatives. This further limits the feasibility of compliance under existing timelines.

Vehicles that need to be categorically exempted from the regulations, in the same manner as those found in part (c) of § 2013 of Title 13 of the California Code of Regulations, should include vehicles that support wildfire prevention, land management, and community protection efforts, in addition to those that respond to and recover from disasters.

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We respectfully request that you amend the ACF exemptions to allow vehicles supporting wildfire mitigation and land management efforts to continue operating effectively in rural communities.

Thank you for your consideration,

A handwritten signature in black ink that reads "Kelsey Siemer". The signature is fluid and cursive.

Kelsey Siemer

District Manager

Honey Lake Valley Resource Conservation District

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