



April 17, 2026

The Honorable Lauren Sanchez
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Fleets 15-Day Comment Period

Dear Chair Sanchez and Members of the California Air Resources Board,

On behalf of San Diego Humane Society, I write to share concerns regarding the 15-day draft. While the goals of the regulation are laudable, the reality remains that we cannot safely serve our communities unless animal care and control vehicles – both municipal and contracted nonprofits like San Diego Humane Society.

While we strongly support California's leadership on climate policy and the goals of the California Air Resources Board, the current regulatory framework does not adequately account for the unique operational realities and funding structures of animal services fleets.

Animal control and animal services vehicles should be granted a targeted exemption or expanded flexibility under the Advanced Clean Fleets regulation due to their unique public safety function, operational constraints, and funding structure, which distinguish them from standard municipal fleet vehicles.

Animal control vehicles function as frontline public safety tools and mobile animal housing units, operating under conditions that differ substantially from the commercial and municipal fleet categories contemplated by the regulation. Without targeted flexibility or exemption, the rule risks undermining critical emergency response capabilities and placing disproportionate financial burdens on nonprofit contractors that already subsidize government services through charitable support.

In more detail:

1. Animal control vehicles function as public safety and emergency response units.

Animal control is not a routine municipal service; it is a frontline public safety function. Officers respond to:

- Animals in immediate distress (e.g., locked in vehicles, injured, exposed to extreme heat)
- Dangerous or aggressive animals posing risks to the public

- Cruelty and neglect cases requiring urgent intervention
- Disaster response and evacuations involving animals

These responses are time-sensitive and unpredictable, often requiring immediate deployment without charging downtime, extended field time and idling to ensure animal safety (e.g., climate control), and operation across large geographic areas without guaranteed access to charging infrastructure.

Unlike many other fleet vehicles, delays or operational limitations can result in direct harm to animals and increased risk to public safety. In function, these vehicles are more analogous to emergency response units than to standard work or delivery vehicles, yet they are not currently afforded the same level of regulatory flexibility.

2. Vehicle configurations are highly specialized and not readily compatible with current ZEV options.

Animal control vehicles are not standard pickups or vans. They are heavily upfitted mobile animal housing units requiring built-in kenneling systems, independent ventilation and climate control for multiple animals, wash-down and sanitation capabilities and power for equipment and extended idle operation

These modifications increase vehicle weight and energy demand, reduce range in electric configurations and require configurations that are not widely available or commercially viable in zero-emission platforms today.

While the ACF regulation allows for limited exemptions where ZEVs are unavailable, animal control vehicles represent a category-wide mismatch between regulatory assumptions and real-world vehicle design.

3. Duty cycles are incompatible with current charging and range limitations.

Animal control operations require long, variable shifts without predictable return-to-base schedules, continuous readiness for emergency dispatch and significant idle time to maintain safe temperatures for animals in transport.

This creates a duty cycle that is fundamentally different from delivery or fixed-route vehicles, which ACF is primarily designed to address. Requiring full electrification without viable operational alternatives risks reduced response capability, increased out-of-service time and compromised animal welfare outcomes.

4. Animal services contractors operate under fundamentally different financial constraints.

A critical and often overlooked factor is that animal services are frequently provided by nonprofit contractors, not fully funded government departments.

Organizations like San Diego Humane Society and similar providers operate under municipal contracts that rarely cover the full cost of service delivery. Specifically, San Diego Humane Society's fourteen municipal contracts only cover about 70% of the actual costs, leaving the nonprofit provider to fundraise \$11 million - \$12 million annually to provide the necessary services.

Requiring rapid fleet electrification imposes significant capital costs (vehicle acquisition and charging infrastructure) that cannot be met with increases in contract funding.

This creates a structural inequity. Public agencies may have pathways to capital funding or bonding but nonprofit contractors must divert charitable contributions intended for mission delivery to comply with unfunded mandates.

In practice this risks reducing service levels, delaying critical investments in animal care and destabilizing already underfunded public-private service models.

5. A targeted exemption or flexibility pathway is consistent with ACF's intent.

The Advanced Clean Fleets regulation already recognizes the need for flexibility where zero-emission vehicles are not yet commercially available and operational requirements cannot be met.

Providing a clear, categorical exemption or extended compliance pathway for animal control vehicles would align with existing regulatory principles and void unintended harm to public safety and animal welfare. Finally, it allows progress toward emissions goals in sectors where electrification is more immediately feasible

Animal control vehicles represent a unique intersection of public safety, animal welfare, and nonprofit service delivery. Applying standard fleet electrification requirements without accommodation for these factors risks undermining both public safety outcomes and the sustainability of essential services.

A narrowly tailored exemption, or, at minimum, a clearly defined and accessible flexibility pathway, for municipal and contracted nonprofit animal control vehicles would ensure that California's climate goals are advanced without compromising critical community services or shifting disproportionate financial burdens onto nonprofit partners.

Sincerely,



Julianna Tetlow

Senior Director of Government Relations
San Diego Humane Society