



# ORANGE COUNTY FIRE AUTHORITY

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April 17, 2026

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

## **SUBJECT: OCFA Advanced Clean Fleets 15-Day Comment Period Response**

Dear Chair Sanchez and Members of the Air Resources Board:

On behalf of the Orange County Fire Authority (OCFA), I am writing to provide comments on the latest proposed amendments to the Advanced Clean Fleets (ACF) Zero Emission Vehicle (ZEV) regulations by the California Air Resources Board (CARB).

OCFA is an all-hazards agency that provides services at the local, state, and national levels. OCFA is a joint powers authority (JPA) that serves two million residents in 23 cities and the unincorporated areas of Orange County with fire protection, advanced paramedic services, and emergency preparedness. Further, as a CAL FIRE contract county, OCFA crews are available to respond to fires throughout California under the state mutual aid system. OCFA is also the sponsoring agency for California Task Force 5 (CA-TF5), one of only 28 FEMA Urban Search & Rescue (US&R) teams in the country, which extends services nationwide during major disasters. OCFA's specialized programs include Fire Prevention, Air Operations, Wildland Firefighting, Hazardous Materials Response, Investigations, Urban Search and Rescue, and Aircraft Rescue and Firefighting at John Wayne Airport (SNA).

For OCFA, fleet reliability is critical to our ability to respond to emergency situations. While ZEV technology continues to improve, concerns remain regarding range limitations, charging times, and performance under extreme conditions. Successful implementation of ZEV depends heavily on charging infrastructure, which currently presents challenges including limited grid capacity, lengthy utility upgrade timelines, and high upfront costs. Additionally, not all fleet types currently have viable zero-emission alternatives, especially heavy-duty and specialty vehicles. Flexibility should be maintained until viable technologies are available.

OCFA appreciates CARB exempting certain emergency response vehicles to date. However, OCFA respectfully requests that CARB reconsider and approve the amendments proposed in the October 7<sup>th</sup> letter submitted by the California Special Districts Association, League of California

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Lake Forest • La Palma • Los Alamitos • Mission Viejo • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana  
Seal Beach • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

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Cities, and California State Association of Counties. The October 7<sup>th</sup> letter requests additional exemptions for vehicles that respond to, assist in and recover from disasters and emergencies to include water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, and disease and vector control vehicles. Some of these vehicles are part of OCFA's fleet or are part of a broader regional response to an emergency situation, and negating their exemption would be an impediment to our ability to protect life and property.

California's leadership on zero emissions is commendable. With thoughtful adjustments, the ACF regulations can achieve its intended goals while preserving critical services. If you have any questions, please contact Ken Piguee, Legislative Affairs Program Manager at 714-573-6048 or [KennethPiguee@ocfa.org](mailto:KennethPiguee@ocfa.org).

Sincerely,



TJ McGovern  
Interim Fire Chief

cc: California Special Districts Association  
League of California Cities  
California Association of Counties  
California Fire Chiefs Association  
Senator Bob Archuleta  
Senator Kelly Seyarto  
Senator Tom Umberg  
Senator Tony Strickland  
Senator Steven Choi  
Senator Catherine Blakespear  
Assembly Member Phillip Chen  
Assembly Member Blanca Pacheco  
Assembly Member Sharon Quirk-Silva  
Assembly Member Avelino Valencia  
Assembly Member Tri Ta  
Assembly Member Kate Sanchez  
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Assembly Member Laurie Davies  
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