



Santa Cruz County Animal Shelter

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April 8, 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 Lauren Sanchez and Members of the California Air Resources Board:

We 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 our small team of Officers cannot safely serve our communities unless emergency support vehicles are exempted.

At Santa Cruz County Animal Services, we serve a community spanning 485 square miles. Our community relies on us for animal rescue and traffic hazard response, animal attack and bite response, disaster and emergency response and animal ambulance services. During emergencies our vehicles must travel the length and breadth of our mountainous county, on paved and unpaved roads, sometimes pulling trailers with livestock or carrying large, heavy loads. They need to be able to stay "in the field" for many hours at a time as we respond to cruelty or hoarding situations or assist with natural disasters.

To prevent unnecessary loss of life and property in the communities we serve, and to save substantial taxpayer funding, please reconsider the amendments respectfully requested 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. Our proposed amendments will enable us to better meet this challenge and effectively navigate the current Advanced Clean Fleets (ACF) mandates and their associated ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating unnecessary challenges in complying while maintaining the many critical services Californians rely upon, especially during emergencies and disasters.

Vehicles that that need to be categorically exempted from the regulations are the same manner as those found in **part (c) of § 2013 of title 13 of the California code of regulations** to include those 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. Animal Control exists, at its core, for the purpose of rabies vector control and the protection of public health and safety. It is already extremely challenging to find and obtain vehicles outfitted adequately for the field work that we do. We respectfully request that you amend the ACF exemptions to allow our vehicles that support emergency services to continue serving our communities when we need them most.

Thank you for your consideration,

Amber Rowland, General Manager, Santa Cruz County Animal Services Authority