

**Clerk of the Board**

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

April 15, 2026

**RE: Advanced Clean Fleets 15-Day Comment Period Response**

**Chair Lauren Sanchez and the 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 safely serve our communities unless emergency support vehicles are exempted.

To prevent unnecessary loss of life and property in the communities we serve, 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 for their most essential daily needs as well as during emergencies and disasters.

Vehicles that respond to, assist in, and provide recovery from disasters and emergencies need to be categorically exempted from the regulations in the same manner as those vehicles found in part (c) of § 2013 of title 13 of the California code of regulations including: 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.

These exemptions are even more critical now as several major manufacturers of medium and heavy-duty vehicles such as Ford, General Motors, Daimler, and Stellantis have announced plans to scale back production of electric vehicles. 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.

**Sincerely,**



Dan Denham  
General Manager

---