



GENERAL MANAGER
Ana M. Ruiz

BOARD OF DIRECTORS
Craig Gleason
Yoriko Kishimoto
Jed Cyr
Curt Riffle
Karen Holman
Margaret MacNiven
Zoe Kersteen-Tucker

April 16, 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 the Members of the California Air Resources Board:

The **Midpeninsula Regional Open Space District (Midpen)** greatly appreciates 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.

Comprised of over 72,000 acres of acquired and protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California, serving almost 770,000 constituents across 550 square miles of coastal, bay shore and mountainous terrain. Our braided mission is to acquire and preserve in perpetuity open space and agricultural land of regional significance, to protect and restore the natural environment, to preserve rural character and encourage viable agricultural use of land resources, and to provide opportunities for ecologically sensitive public enjoyment and education.

The mission of Midpen extends beyond habitat conservation, our staff provide a critical safety role in the 17 cities and 3 counties where we operate. During emergencies, regular patrol, and non-emergency response, Midpen vehicles must travel over 100 miles per day with multiple 1500' climbs and descents on paved, unpaved fire roads, and rural patrol routes. Combined with the rugged requirements of off-road use, these strenuous demands of everyday operational use have a fatiguing effect on EV vehicle battery life. District vehicles must also idle for several hours at a time when on scene of emergency events with all safety lights engaged. In order to integrate with local fire services, 25% of the emergency vehicle fleet must also fit within the specification of a type 6 Wildland Firefighting apparatus.

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 that need to be categorically exempted from the regulations 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: fire prevention vehicles, fire protection vehicles, and search and rescue 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.

Thank you for your consideration,



Brian Malone
Assistant General Manager