



## California Animal Welfare Association

Promoting Excellence in Animal Care, Sheltering, and Law Enforcement since 1909

April 16, 2026

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Chair Sanchez,

On behalf of animal control agencies across California, CalAnimals is respectfully resubmitting our petition to your Board to recognize and facilitate the essential role Animal Control Officers (ACOs) and Humane Law Enforcement Officers (HELOs) play in preserving our communities' public safety by including the vehicles used by these officers together with other emergency response and law enforcement vehicles as exempt from the Clean Fleet standards. This matter is raising continued alarm among our membership including concern that the current comment period is insufficient at only 15 days.

We appreciated the receptive consideration your Board gave this matter when this issue was first presented to you on September 25, 2025 and – at your direction – attempted to work collaboratively with CARB staff to identify a solution to the concerns we had identified at that time. Unfortunately, CARB staff were resistant to even a very specific and targeted exemption for the vehicles used by these first responders, maintaining that we identify accommodations within the existing exemptions. That position was not consistent with the direction provided by your board and CalAnimals remains deeply concerned that these regulations will create a serious impediment on our officers' ability to provide vital community services. In fact, the proposed extension of the Clean Fleets regulations to contracted non-profit organizations has compounded those concerns since many municipalities and counties coordinate with non-profit animal welfare organizations to provide animal care and control functions.

We again urge you to consider the following factors:

- **Public Safety and Emergency Response Role of ACOs & HLEOs:** While ACOs and HLEOs are not classified as peace officers, and hence vehicles utilized by them are not exempt from Clean Fleet requirements, they are vested by State law with many of the same authorities – including the power of arrest, the authority to serve search warrants and carry firearms. ACOs and HLEOs often work in coordination with traditional law enforcement, fire departments, and emergency services agencies to respond to public safety incidents, rescue scenarios, and community disaster events. We are frontline responders during wildfires, floods, and evacuations. In many jurisdictions our vehicles routinely cover hundreds of miles in a single shift. They must be able to traverse difficult terrain and remain in continuous operation in order to provide a safe and humane environment and uninterrupted ventilation for transported animals. Critically, ACO & HLEO vehicles must be dependable and able to operate throughout the duration of emergencies or disasters which may disrupt electrical service.

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- **Lack of Viable Alternatives:** Despite rapid advances in clean vehicle technology, there remain no viable ZEV/NZE models in the Class 2b and Class 3 categories that fully meet the operational needs of animal control agencies. Similarly, reducing to a lower class vehicle is not an option for most agencies since standard animal containment boxes are not manufactured to fit on those smaller vehicle frames, nor do those vehicles have an equivalent carrying/tow capacity. The lack of viable alternative vehicles is further compounded by a lack of rapid charging stations in the remote and rural areas served by our officers.
- **Unintended Operational and Fiscal Impacts:** The inability to procure compliant vehicles that meet operational requirements will limit our capacity to respond effectively to both routine service and emergency calls. It is likely that agencies would need to purchase multiple vehicles just to replace the functional capabilities of a single ACO or HLEO unit currently in service; maintaining those additional vehicles at the same level of response readiness would also require additional personnel.

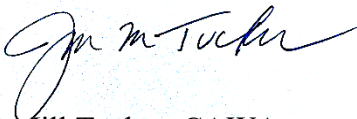
These concerns could be mitigated through the addition of a targeted and narrowly worded exemption as follows:

*“Vehicles owned by an entity employing officers whose authorities are established by California Penal Code §830.9 (Animal Control Officers) or Corporations Code §14502 (Humane Law Enforcement Officers), and used exclusively by those officers in the performance of their duties.”*

This wording - while it provides an exemption for vehicles operated by ACOs and HELOs - would still ensure any vehicles that do not have a direct function in support of those essential services would remain subject to the Clean Fleet standards.

For these reasons we respectfully resubmit our request that your Board establish this narrow exemption for ACOs and HELOs ensure their continued ability to reliably and effectively serve the interests of animal welfare and public safety.

Sincerely,



Jill Tucker, CAWA  
CEO