

## County of Riverside Transportation Department (Richard Miller)

I would like to see some consideration for counties due to the square miles (7200) they need to cover and the lack of range on class 6,7,8 trucks. One more note, the only "in production" BEV pickup has a 5'11" and the Max range battery combination payload capacity is 1,000-1,500 lbs. In our fleet, 75% of our pickups carry a 100 gallon diesel fuel tanks to refuel our off highway equipment, when you take the 710 lbs. of diesel fuel and the 2' for the tank (now a 3'11" bed), the BEV current "in production" pickup is incapable of meeting all our needs. I'm a believer in cities, schools districts and small geographical areas being able to utilize BEV units without diminishing response times and needed services to whom the provide service to.



*Dennis Acuna, P. E., T. E.*  
*Director of Transportation*

# **COUNTY OF RIVERSIDE**

## **TRANSPORTATION AND LAND MANAGEMENT AGENCY**

*Hector D. Davila, P.E.*  
*Deputy for Transportation/Capital  
Projects*

*Russell Williams*  
*Deputy for Transportation/Planning and  
Development*

## **Transportation Department**

**04-14-2026**

**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:**

**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.**

**Here at the County of Riverside Transportation Department, we are responsible for maintaining 2,100 miles of county roads spread over a county of over 7,200 square miles. On any given day, our dedicated teams could drive more than 250 miles in vehicles ranging from 2b to class 8 to serve the needs of a population that exceeds 2,400,000 citizens. The County of Riverside has a wide range of climate zones which lend to special needs and equipment. In the mountainous areas we utilize snowplows, in the desert areas we utilize loaders, graders and bulldozers to clear blowing sand or debris from storm damage. All these operations rely not only on the equipment used, but they also rely on support vehicles, which could be in use for extended periods of time during certain situations.**

**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: water utility vehicles, flood protection vehicles, sewer utility vehicles, electric utility vehicles, fire prevention vehicles, fire protection vehicles, search and rescue vehicles, disease and vector control vehicles, road repair vehicles, signal light repair vehicles, tree removal 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,**

**Richard Miller**

**Transportation Fleet Operations Manager**