

Burbank Paradise Fire Department (Chief Peter Golling)

Burbank Paradise Fire Protection District
Stanislaus County, California

Date: 4/14/2026

To: California Air Resources Board (CARB)
Subject: URGENT: Request for Full Emergency Vehicle Exemption – Advanced Clean Fleets Regulation

Dear Members of the Board,

I am writing on behalf of the Burbank Paradise Fire Protection District & Stanislaus County to formally demand a full and explicit exemption for all fire service emergency response vehicles from the Advanced Clean Fleets (ACF) regulation.

Fire districts like ours exist for one purpose: to protect life, property, and public safety. Any regulatory action that compromises our ability to respond effectively is not only impractical—it is unacceptable.

The current framework, while providing exemptions for certain government and law enforcement vehicles, fails to adequately recognize the operational realities of the fire service. Fire apparatus are not interchangeable with standard fleet vehicles. They are specialized, mission-critical assets that must meet strict performance, reliability, and response-time requirements under extreme and unpredictable conditions.

Key concerns include:

Operational Reliability: Emergency response vehicles must be ready at all times, with zero tolerance for failure. Current zero-emission technologies do not yet demonstrate the reliability required for fire suppression and emergency medical response in all environments.

Infrastructure Limitations: Rural and small districts, such as ours, do not have the electrical infrastructure necessary to support rapid charging of heavy apparatus, particularly during extended incidents or disaster conditions.

Financial Impact: Imposing unfunded mandates on small special districts will have devastating consequences. Our annual operating budget is approximately \$360,000. The cost of replacing even a single apparatus under these requirements would severely impact, if not eliminate, our ability to provide service.

Equity and Fairness: It is deeply concerning that other emergency and government vehicles—such as law enforcement and state-operated fleets—are more clearly protected, while fire agencies are left in a position of uncertainty. Firefighters should not be placed at a disadvantage when public safety is on the line.

Fire response is not optional. Delays cost lives. Equipment failure costs lives. Policy decisions must reflect that reality.

We are not opposed to long-term environmental goals. However, those goals must not come at the expense of immediate life safety. Until zero-emission technology can fully meet the operational demands of fire service agencies without compromise, fire apparatus must be fully exempt.

Therefore, we formally request:

A clear, permanent exemption for all fire service emergency response vehicles, including engines, tenders, rescue units, and command vehicles , Personal Chief Vehicles that are Registered with CHP that are Emergency Vehicles.

Written clarification that no compliance timelines will apply to fire districts under the ACF regulation.

Recognition of the unique operational, financial, and infrastructure constraints faced by small and rural fire districts.

Failure to provide these protections places communities like ours at unnecessary risk.

We stand ready to engage in constructive dialogue; however, we will also strongly oppose any regulatory action that jeopardizes our ability to protect the public.

Respectfully,

Peter Golling
Fire Chief
Burbank Paradise Fire Protection District
Stanislaus County, California