



VALLEY CENTER FIRE PROTECTION DISTRICT

28234 Lilac Road, Valley Center, CA 92082
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Website: <https://www.vcfpd.org>



April 15, 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.

The Valley Center Fire Protection District currently serves a community spanning 84.5 miles. Our community relies on us for Fire Protection, Rescue, Haz Mat and Community Risk Reduction. During emergencies our vehicles must travel up to 10 miles and run for 12 hours at a time, in extreme fire, weather and hazardous conditions.

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](#), and [disease and vector control 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 with respect,

Josef G. Napier

Fire Chief, Valley Center Fire Department

Valley Center Fire Station 1
28234 Lilac Road
Valley Center, CA 92082

Valley Center Fire Station 2
28205 N. Lake Wohlford Road
Valley Center, CA 92082

Valley Center Fire Station 3
30100 Cole Grade Road
Valley Center, CA 92082