

California Association of Resource Conservation Districts (Nancy Wahl-Scheurich)



April 13, 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 California Association of Resource Conservation Districts (CARCD) represents Resource Conservation Districts (RCDs) throughout the state that work on natural resource and climate resilience projects, including critical wildfire prevention projects.

The State's Wildfire and Forest Resilience Task Force has set clear goals to significantly increase the pace and scale of fuels reduction and forest health treatments across California. The ACF mandates, as currently structured, risk slowing this critical work by limiting access to the reliable vehicles needed to implement projects in remote and high-risk areas. This creates a direct conflict between statewide climate policies and wildfire resilience objectives, making it more difficult to achieve the Task Force's goals of reducing catastrophic wildfire risk and protecting communities.

Additionally, it remains unclear whether and how the ACF mandate applies to contractors and project partners that RCDs rely on to implement forest health and fuels reduction projects. Many of these partners operate heavy equipment, such as feller bunchers and other large machinery, that must be transported into remote project areas using heavy-duty trucks. At present, there are no practical zero-emission alternatives capable of reliably transporting this type of equipment under real-world rural conditions. Requiring such a transition prematurely would create significant barriers to project implementation and further slow the pace of critical wildfire mitigation work.

Furthermore, RCDs rely almost entirely on grant funding to carry out their work and lack the financial capacity to prematurely replace their fleets with zero-emission vehicles, particularly when the technology is not yet viable for our operational needs. Requiring the early replacement of recently funded equipment is an inefficient use of public resources and imposes an additional financial burden on small rural agencies.

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, such as RCDs, continue to do their part to achieve the State's climate and emissions goals. The proposed amendments will enable RCDs 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 need to be categorically exempted from the regulations, in the same manner as those found in part (c) of § 2013 of Title 13 of the California Code of Regulations, should include vehicles that support wildfire prevention, land management, and community protection efforts, in addition to those that respond to and recover from disasters.

We respectfully request that you amend the ACF exemptions to allow vehicles supporting wildfire mitigation and land management efforts to continue operating effectively throughout the state.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Nancy Wahl Scheurich". The signature is fluid and cursive, written in a professional style.

Nancy Wahl Scheurich
Executive Director