



April 17, 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 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 special districts cannot effectively serve our communities unless vehicles supporting emergencies, wildfire prevention, and land management are appropriately considered.

At the Resource Conservation District of Greater San Diego County (RCDGSDC), a large portion of our work is dedicated to wildfire resilience – this includes working with partners to implement forest health and wildfire fuel reduction projects on the ground. This work is critical to reducing wildfire intensity and protecting lives, property, and natural resources before fires occur. Many of our fellow RCDs across the state also do this work, some of whose projects require vehicles to travel long distances across remote terrain and operate for extended periods in extreme heat, rugged conditions, and areas without access to fueling or charging infrastructure. These operational realities are not well aligned with current zero-emission vehicle capabilities or infrastructure availability in rural regions.

To prevent unnecessary risk to the communities we serve, we respectfully request reconsideration of the amendments outlined 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. However, the current Advanced Clean Fleets (ACF) mandates create significant challenges for rural agencies attempting to comply while maintaining essential wildfire mitigation and land stewardship activities. In a county like Tehama, where wildfire risk is constant and increasing, the ability to carry out fuels reduction work efficiently is directly tied to community safety.

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 like ours rely on to implement forest health and fuels reduction projects. Many of these partners operate heavy equipment that must be transported into remote project areas



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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.

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 in rural communities.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Ann Baldrige", with a long horizontal flourish extending to the right.

Ann Baldrige
Executive Director, RCDGSDC