



Wednesday, June 3, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets 2nd 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 second 15-day comment period draft of the Advanced Clean Fleets (ACF) regulation published June 1, 2026 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 excluded from the regulation.

At San Miguel Fire & Rescue, we serve over 150,000 residents and businesses across more than 50 square miles, responding to over 15,000 9-1-1 calls annually for emergency medical services and fire suppression. Emergency response vehicles must idle for extended periods to support critical functions, including emergency lighting, communications, onboard computers, water pumping during firefighting, and refrigeration of temperature-sensitive medications. Continuous engine operation is also essential to maintain heating and cooling systems necessary for both equipment functionality and personnel readiness.

To prevent unnecessary loss of life and property in the communities we serve, please reconsider the amendments respectfully requested in the April 14th 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 ACF regulation and its ambitious compliance deadlines. Of critical concern to our community, the ACF mandates on local agencies are creating untenable and 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.

The exemptions in the current regulation and draft amendments remain wholly and dangerously insufficient.

In the same manner as the vehicle categories currently identified in **part (c) of § 2013 of title 13 of the California code of regulations**, we respectfully request a categorical exclusion for vehicles that respond to, assist in and recover from disasters and emergencies, including: 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.

Thank you for your consideration,


Andy Lawler, Fire Chief