



California Fuels and Convenience Alliance

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**September 10, 2025**

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Proposed Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard (LCFS) Amendments**

On behalf of the California Fuels and Convenience Alliance (CFCA), we appreciate the opportunity to provide comments on the California Air Resources Board's (CARB) proposed amendments to the Advanced Clean Fleets (ACF) regulation and the Low Carbon Fuel Standard (LCFS).

The California Fuels and Convenience Alliance (CFCA) represents approximately 300 members, including nearly 90% of all independent petroleum marketers in the state and more than half of the state's 12,000 convenience retailers. Our members—predominantly small, family- and minority-owned businesses—play a vital role in California's fuel supply chain, serving local governments, emergency services, school districts, transit companies, independent fuel retailers, and the agriculture industry.

**ADVANCED CLEAN FLEETS (ACF) AMENDMENTS**

CFCA commends CARB for its proposal to repeal the federal and private fleet provisions of the ACF regulation, specifically the Drayage Requirements (§ 2014) and the High Priority and Federal Fleet Requirements (§ 2015). These changes reflect an important recognition of the significant infrastructure, cost, and technology challenges that these provisions posed.

This repeal is also important because the provisions faced substantial legal and practical barriers. The Clean Truck Partnership and its members have consistently raised concerns about the validity of these mandates, particularly given the lack of an approved federal waiver. Without such a waiver, enforcement would have remained highly uncertain, leaving fleets, businesses, and regulators in a position of prolonged instability. By repealing these requirements, CARB has taken a pragmatic step that acknowledges both the concerns of key stakeholders and the regulatory realities that made implementation infeasible.

We are further encouraged that these proposed amendments bring California's regulatory approach into closer alignment with federal actions, creating greater consistency across jurisdictions. This coordination will help reduce compliance uncertainty and better support businesses, agencies, and communities working toward a clean transportation future.

## **LOW CARBON FUEL STANDARD (LCFS) – HYDROGEN REFUELING INFRASTRUCTURE (HRI)**

CFCA supports CARB's proposed changes to the hydrogen refueling infrastructure (HRI) crediting program, which would reduce the derating factor and allow public stations to receive credits up to their full nameplate capacity, and private stations up to 50%. These modifications represent a meaningful step toward strengthening the business case for hydrogen refueling investments and will help accelerate the availability of stations capable of serving medium-duty fuel cell vehicles.

To maximize the effectiveness of these changes, however, it is essential that the LCFS crediting framework remain open to all types of hydrogen that can contribute to decarbonization. Ensuring that hydrogen from diverse production pathways is able to generate credits will broaden investment, spur competition, and accelerate the development of a more robust marketplace. A technology-neutral approach is critical for scaling hydrogen infrastructure quickly and achieving meaningful, market-wide progress toward California's clean transportation goals.

## **CONCLUSION**

CFCA appreciates CARB's responsiveness to stakeholder concerns and its commitment to refining these important regulatory programs. We view the proposed amendments to the ACF and LCFS as positive steps that enhance regulatory alignment, encourage investment, and support California's broader clean transportation goals while maintaining affordability for all small businesses and Californians alike.

We thank you for the opportunity to provide feedback on the proposed amendments and look forward to continued engagement to ensure these regulations support both innovation and practical implementation.

*If you have any questions, please contact CFCA's Sr. Director of Government Affairs, Alessandra Magnasco, at [alessandra@cfca.energy](mailto:alessandra@cfca.energy).*

Sincerely,

A handwritten signature in black ink, appearing to read 'Alessandra Magnasco', with a stylized, flowing script.

Alessandra Magnasco  
Sr. Director of Government Affairs