



September 22, 2025

Ms. Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Request the Advanced Clean Fleets Regulation to be Amended to Include Renewable Natural Gas Fueled Vehicles

Madam Chair Randolph:

We write to request that CARB address a pressing issue when it considers changes to the Advanced Clean Fleets (ACF) regulation this fall. CARB's ACF Regulation requires local public agencies to electrify and decarbonize their fleets. At the same time, pursuant to SB 1383 (Lara, 2016), CalRecycle mandates that local cities and counties divert 75% of all organic waste from landfills. The two primary means of managing this diverted organic waste are anaerobic digestion which produces renewable natural gas (RNG) and compost. Implementation of ACF and SB 1383 regulations have created contradictory mandates for local agencies, hindering achievement of the methane reduction mandates enacted in SB 1383. Local agencies are expected to make products from diverted organic waste and procure them, but proposed ACF regulations would remove a critical option by not allowing vehicles to use the RNG produced from diverted organic waste.

Modifying the definition of the near-zero emission vehicle (NZEV) provides a simple way to align regulatory implementation and affordably maximize methane emission reductions. Expanding the NZEV definition to include wastewater biogas-powered low-NOx engine vehicles in the ACF regulation would provide multiple benefits:

- Enables agencies to purchase and use readily available and mission-capable vehicles powered by renewable wastewater biogas that provide the needed immediate emissions reductions;
 - Fleets already required to purchase CNG vehicles – such as trash haulers — can seamlessly switch to RNG instead of fossil-based natural gas;
- Supports a circular economy that beneficially uses organic waste to replace fossil fuels with RNG;
- Supports diverting organic waste from landfills thus reducing methane emissions.

Thank you for your ongoing leadership in urgently addressing climate change in California. We ask that you continue this leadership by modifying the ACF regulation to allow RNG vehicles fueled by wastewater biogas to qualify as near-zero emission vehicles in order to rapidly reduce

emissions, protect California's residents from unaffordable rate hikes, and bolster community climate resilience into the future.

Sincerely,



JUAN CARRILLO
Assemblymember, 39th District



KELLY SEYARTO
Senator, 32nd District



MARK GONZÁLEZ
Assemblymember, 54th District



SHANNON GROVE
Senator, 12th District



JOE PATTERSON
Assemblymember, 5th District



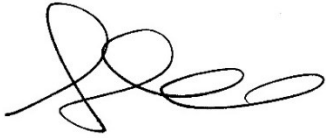
LETICIA CASTILLO
Assemblymember, 58th District



JOSÉ LUIS SOLACHE
Assemblymember, 62nd District



MIKE GIPSON
Assemblymember, 65th District



STAN ELLIS

Assemblymember, 32nd District



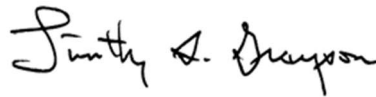
JOHN HARABEDIAN

Assemblymember, 41st District



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Assemblymember, 30th District



TIM GRAYSON

Senator, 9th District



ANAMARIE AVILA FARIAS

Assemblymember, 15th District



JACQUI IRWIN

Assemblymember, 42nd District

cc: Board Members, Air Resources Board
Lauren Sanchez, Office of the Governor and Board Chair-Designee
Dr. Steve Cliff, Executive Officer