

William Mancilla

Administrative Analyst for ACF, compliance and reporting, City of Sacramento

5730 24thj street, Building 1

Sacramento, CA 95822

wmancilla@cityofsacramento.org

916-808-8465 / 530-709-0077

September. 25. 2025

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Subject: Comments on Proposed Amendments to the Advanced Clean Fleets (ACF) Regulation

Dear Chair and Members of the Board,

I am writing to provide comments on the recently proposed amendments to the Advanced Clean Fleets (ACF) regulation. While I strongly support CARB's overarching goals of reducing emissions and accelerating the transition to zero-emission vehicles (ZEVs), I have serious concerns about several of the proposed changes.

The proposal to repeal drayage fleet requirements represents a step backward. Drayage trucks, especially those operating in and around ports, are among the easiest segments to electrify today. Numerous pilot projects and commercially available ZEV drayage models already demonstrate that these vehicles are viable for port operations. Ports remain some of the most polluted regions in California, with surrounding communities disproportionately impacted by emissions. Polluting our waters and contributing to Climate change. Rolling back requirements for drayage fleets not only jeopardizes air quality improvements, our oceans health and its ability to remain a significant carbon sink. Furthermore, removing the drayage requirement would ignore the imperative environmental justice to reduce the burdens on overexposed port communities and low income communities.

Similarly, the removal of the high priority fleet requirements is deeply troubling. If CARB has already determined that certain fleets qualify as "high priority," then they should remain so. These fleets were identified for a reason: they represent large and influential operators whose compliance is necessary to drive market transformation. Stripping away

these requirements risks creating loopholes, slowing adoption, and sending mixed signals to both industry and communities that depend on CARB to safeguard their air quality.

However, the greatest challenge to ACF compliance today is not the willingness of fleets to transition—it is the unwillingness of manufacturers to provide viable alternatives. Fleets are being placed in a position where they are regulated to comply, but the market does not yet supply ZEVs capable of replacing diesel vehicles across all classes and use cases. Manufacturers continue to focus on leveraging ZEV sales for compliance credits, primarily to justify selling more diesel vehicles. This has been the approach multiple manufacturers have discussed with our organization while showcasing ZEVs. This approach prioritizes their short-term profits over California's long-term environmental and public health goals and undermines our organizations desire to switch to clean vehicles.

As long as Class 4 and above ZEV trucks cannot match the operational capabilities of their diesel counterparts—or are priced so high as to be economically impractical for low-utilization applications—fleets cannot realistically comply without taking a huge burden on our side and to our city's taxpayers. It is not equitable or effective to enforce compliance requirements on government agencies and private fleets if manufacturers refuse to provide the tools necessary to achieve that compliance. CARB must therefore shift greater accountability onto manufacturers. The regulation should be designed to ensure that manufacturers cannot continue to saturate the market with diesel, and other combustion vehicles in the name of 'ACF compliance'. While fleets recognize we have a commitment to change operations and adjust accordingly to this ZEV transition, if manufacturers are not required to produce viable vehicles in sufficient quantities, then enforcement of ACF requirements will fall unfairly on fleets that want to comply but are structurally unable to do so.

CARB has long been recognized as a national leader in environmental policy. To reinforce confidence in the ACF, CARB cannot afford to dilute the strength of the ACF regulation. Rolling back drayage and high priority fleet requirements, without corresponding accountability from manufacturers, risks stalling progress and undermining CARB's mission. I urge CARB to reconsider these amendments and to retain drayage requirements, keep high priority fleet requirements intact, hold manufacturers directly accountable for producing viable ZEVs, and continue to push for investment and innovation in the ZEV technology sector. California has led the nation in advancing clean transportation, and it is critical that the ACF remain strong, enforceable, and fair ensuring that responsibility is shared across fleets, manufacturers, and regulators.

Thank you for your consideration of these comments. I look forward to seeing CARB continue to lead with ambitious and effective climate policy.

Respectfully submitted, William Mancilla

Administrative Analyst for ACF, compliance and reporting, City of Sacramento