

September 15, 2025

Honorable Chair Liane Randolph
Honorable Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814



RE: NRDC Comment on Proposed Amendments to the Advanced Clean Fleets Regulation

Dear Chair Randolph and Members of the Board,

On behalf of the Natural Resources Defense Council (NRDC), thank you for the opportunity to comment on the California Air Resources Board's (CARB) proposed amendments to the Advanced Clean Fleets (ACF) regulation.

NRDC recognizes the difficult but necessary decision to repeal the Drayage and High Priority Fleet provisions of the ACF regulation following the withdrawal of California's waiver request. This action reflects the current federal political landscape and the lack of timely authorization from the U.S. Environmental Protection Agency. While these changes are required, they do not diminish the urgency of addressing the public health and climate harm caused by diesel pollution from medium and heavy-duty vehicles (MHDVs), which remain the largest source of nitrogen oxide pollution and a significant contributor to greenhouse gas emissions and particulate matter.

Despite these developments, the ACF regulation continues to serve as a critical framework for transitioning California's transportation sector toward zero-emission technologies. The SLG fleet provisions, including those amended pursuant to AB 1594, offer a pathway for continued progress. Electrifying public fleets is a foundational step in scaling zero-emission vehicle (ZEV) deployment, supporting infrastructure development, and demonstrating feasibility across diverse use cases. These fleets play a key role in accelerating market transformation and reducing exposure to diesel pollution, particularly in communities disproportionately impacted by freight operations.

NRDC urges CARB to maintain a clear and consistent trajectory towards a zero-emission transportation future. The retention of the 2036 sales requirement is essential, but additional regulatory and policy actions will be needed to ensure its technical and

economic viability. This includes expanding investments into ZEV infrastructure and leveraging complementary mechanisms such as indirect source rules and clean freight incentives.

California's leadership in clean transportation policy has been instrumental in driving national progress. In the face of federal opposition, it is imperative that CARB continue to send strong signals to the market and to communities that the state remains committed to reducing pollution, protecting public health, and achieving its climate goals.

Thank you for the opportunity to provide these comments.

Sincerely,

Guillermo Ortiz

Senior Clean Vehicles Advocate

Natural Resources Defense Council