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July 15, 2026

Submitted via CARB Electronic Comment System

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Second 15-Day Modifications – Permanent Adoption of the Emergency Vehicle Emissions Regulations

Dear Chair Sanchez and Members of the Board:

On behalf of the NAFA Fleet Management Association (NAFA), we appreciate the opportunity to provide comments regarding the Second 15-Day Modifications associated with the Permanent Adoption of the Emergency Vehicle Emissions Regulations.

NAFA is the world's largest membership association representing professionals responsible for fleet and mobility management across the public, commercial, nonprofit, utility, educational, and private sectors. Collectively, our members oversee more than 4.8 million vehicles, manage assets exceeding $122 billion, and direct fleet operations totaling more than 84 billion miles annually.

The organizations represented by NAFA are responsible not simply for complying with vehicle regulations, but for translating regulatory requirements into reliable public services. Every day, they balance California's environmental objectives with public safety, fiscal stewardship, emergency preparedness, operational resilience, infrastructure readiness, workforce capability, and the uninterrupted delivery of essential services. Those responsibilities require long-term decisions involving vehicle procurement, capital planning, infrastructure deployment, maintenance operations, workforce development, lifecycle management, contractor oversight, and emergency preparedness.

California's fleet community includes state agencies, counties, cities, public safety organizations, utilities, transit providers, airports, ports, educational institutions, water districts, and numerous other public and private organizations that depend upon professional fleet management to fulfill their missions. Whether responding to wildfires, restoring service following Public Safety Power Shutoffs (PSPS), supporting disaster recovery after floods or earthquakes, maintaining critical infrastructure, restoring utilities, or providing emergency

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medical and public safety services, these organizations depend upon reliable fleet operations to serve California's residents.

NAFA has consistently supported policies that improve environmental performance while recognizing the operational realities of fleet management. Our objective is not to revisit policy decisions reflected in these Second 15-Day Modifications. Rather, our objective is to help ensure those decisions can be implemented successfully, efficiently, and sustainably by the organizations responsible for carrying them out.

The Second 15-Day Modifications primarily provide legal clarification regarding the continued applicability of certain California vehicle emissions standards while litigation concerning recent federal actions remains pending. NAFA appreciates CARB's efforts to provide additional regulatory certainty during this period of legal uncertainty.

Regulatory clarification, however, represents only the beginning of successful implementation.

California's fleet transition has now entered a new phase. As regulatory requirements move from rulemaking into day-to-day implementation, the measure of success will no longer be the language of the regulation itself, but whether regulated organizations can consistently comply while continuing to deliver the essential public services upon which California depends.

That transition also represents an important shift in CARB's continuing responsibilities. Successful implementation will require more than regulatory clarity. It will require practical implementation guidance, timely administrative direction, transparent compliance expectations, workable reporting processes, and continued engagement with the organizations responsible for implementing these requirements. Recent discussions between CARB staff and California fleet organizations reinforce the need for continued administrative leadership as implementation proceeds.

Accordingly, these comments focus not on the underlying policy decisions reflected in the Second 15-Day Modifications, but on the practical implementation considerations that will ultimately determine whether those policies achieve their intended objectives. CARB's responsibility did not conclude with adoption of the regulations. The implementation phase now requires continued administrative engagement to ensure the regulations can be applied consistently, transparently, and successfully across California's extraordinarily diverse fleet community.

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Regulatory Certainty Supports Effective Long-Term Fleet Planning

Fleet management operates on planning horizons measured in years rather than months. Unlike many regulated industries, fleet organizations must simultaneously balance regulatory compliance, public safety, emergency preparedness, operational continuity, fiscal stewardship, workforce readiness, infrastructure development, and long-term capital investment while supporting mission-critical services twenty-four hours a day, seven days a week.

Public agencies routinely develop multi-year vehicle replacement plans, capital improvement programs, charging and fueling infrastructure investments, procurement schedules, maintenance strategies, workforce training initiatives, and budget forecasts based upon anticipated regulatory requirements. Many acquisition decisions being made today will influence fleet operations well into future fiscal years, making regulatory predictability a fundamental component of responsible asset management rather than simply an administrative consideration.

Vehicles frequently remain in service for ten to twenty years, so replacement decisions have to take a long view. Charging and fueling infrastructure, maintenance facilities, workforce development, supporting technologies, and related capital investments often influence operational capability for more than a decade. Regulatory certainty therefore serves not merely as a compliance objective, but as an essential component of responsible public-sector asset management, fiscal stewardship, operational readiness, and long-term planning.

California's public agencies have already committed substantial investments toward vehicle transition planning, charging infrastructure, maintenance facilities, workforce development, capital equipment, and related operational improvements. Protecting those investments requires implementation expectations that are sufficiently clear to support responsible procurement decisions while allowing agencies to continue advancing California's environmental objectives without unnecessary operational disruption.

Successful implementation ultimately depends upon administrative execution. Reporting systems, compliance procedures, contractor coordination, exemption processes, implementation guidance, and regulatory interpretation must function as effectively as the regulations themselves. Regulated organizations should not be placed in the position of resolving administrative questions after regulatory requirements become effective. Providing timely implementation guidance is therefore not simply beneficial—it is an essential component of successful regulatory implementation.

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California's public fleets also represent a critical component of the State's emergency management and infrastructure resilience capabilities. As California continues experiencing increasingly frequent wildfires, Public Safety Power Shutoffs, floods, earthquakes, severe weather events, and other emergencies, fleet availability frequently determines how quickly public agencies can protect lives, restore essential services, reopen transportation corridors, support utility restoration, restore communications infrastructure, and return communities to normal operations.

These operational responsibilities cannot be deferred while implementation questions remain under review. Fleet organizations must ensure replacement planning, maintenance readiness, fueling and charging infrastructure, contractor coordination, workforce preparedness, and supply chain continuity remain sufficient to support emergency operations under demanding conditions. Utility restoration crews, public works departments, emergency management agencies, law enforcement, fire departments, emergency medical services, and numerous other first responders all depend upon fleet capabilities that require years—not weeks—of planning.

Implementation must also recognize California's extraordinary operational diversity. Dense urban jurisdictions, suburban communities, mountain regions, agricultural areas, deserts, coastal communities, and large rural counties each present fundamentally different operating environments. Successful statewide implementation will therefore require administrative flexibility sufficient to accommodate these differing operational conditions while maintaining consistent regulatory objectives.

Ultimately, California's environmental objectives will be achieved through successful implementation—not through regulatory text alone. Those objectives depend upon whether regulated organizations can procure, maintain, deploy, and replace the vehicles necessary to deliver essential public services. Regulatory certainty and implementation clarity therefore remain indispensable to both operational resilience and the long-term success of California's fleet transition.

Fleet organizations recognize that regulatory programs naturally evolve in response to legislative action, judicial decisions, technological advancement, market conditions, and changing public policy priorities. Regulatory certainty does not require regulatory permanence. It requires sufficient clarity regarding applicable requirements to support responsible planning, investment, and operational decision-making.

Predictable implementation expectations allow public agencies and other regulated organizations to continue vehicle replacement planning, infrastructure deployment,

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procurement activities, workforce preparation, and long-range capital investment with greater confidence. They likewise provide certainty for manufacturers, utilities, infrastructure providers, maintenance contractors, vehicle suppliers, engineering firms, and numerous other partners supporting California's fleet transition.

Conversely, prolonged implementation uncertainty produces measurable operational consequences. Procurement decisions may be delayed, infrastructure investments deferred, contractor participation reduced, vendor costs increased, and long-term capital planning disrupted. These outcomes affect not only regulated organizations—they directly influence California's ability to achieve its own environmental objectives efficiently and consistently. Continued implementation certainty therefore serves both the regulated community and CARB's broader policy objectives.

Continued Communication Enhances Successful Implementation

As California's vehicle emissions programs continue evolving through ongoing legal, regulatory, and administrative developments, sustained communication between CARB and the regulated fleet community will remain essential to successful implementation.

Timely, transparent, and proactive communication allows regulated organizations to incorporate evolving implementation guidance into procurement cycles, infrastructure planning, workforce preparation, contractor management, compliance systems, and budget development before operational decisions become difficult or costly to modify. Early communication improves planning, reduces uncertainty, and strengthens statewide implementation consistency.

Recent implementation discussions reinforce why this continuing dialogue remains so important. Fleet organizations identified numerous practical questions involving contractor reporting obligations, rental vehicle compliance, government-to-government service agreements, contractor data collection responsibilities, exemption administration, and other operational issues directly affecting day-to-day implementation. CARB staff acknowledged that several of these issues remain under review and require additional administrative consideration before definitive guidance can be provided. These discussions demonstrate that implementation questions are no longer theoretical—they are already influencing operational planning throughout California's regulated fleet community.

The implementation phase now requires CARB to provide guidance that is as practical as the regulations themselves. Technical advisories, implementation bulletins, frequently asked

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questions, webinars, stakeholder updates, reporting guidance, and other administrative resources should become an ongoing component of implementation rather than an occasional supplement to the regulatory program. Timely guidance reduces uncertainty, strengthens compliance, promotes statewide consistency, and enables regulated organizations to focus resources on implementation rather than regulatory interpretation.

Successful implementation depends upon resolving uncertainty before it affects fleet operations—not after procurement decisions have been finalized, contracts executed, infrastructure investments committed, or budgets adopted. Administrative clarity delivered early in the implementation process is considerably more valuable than corrective guidance issued after organizations have already committed significant operational and financial resources.

Continued communication also strengthens regulatory credibility. Organizations responsible for implementation are more likely to achieve consistent compliance when implementation expectations are communicated clearly, administrative questions are resolved promptly, and evolving guidance is shared transparently across the regulated community. Maintaining that dialogue should remain an ongoing implementation priority as California's fleet transition continues to mature.

Ultimately, implementation succeeds through partnership rather than regulation alone. Continued communication allows CARB to better understand emerging operational challenges while enabling regulated organizations to anticipate changing implementation expectations before those challenges affect compliance, public services, or long-term planning.

Implementation Should Reflect Operational Realities

Although these Second 15-Day Modifications primarily provide legal clarification, the operational realities confronting California's regulated fleet organizations remain unchanged. The implementation phase now requires regulatory requirements to function effectively within the complex operational environments where California's environmental objectives are ultimately achieved.

Fleet organizations continue making long-term investment decisions based upon funding availability, procurement requirements, manufacturer production schedules, utility coordination, infrastructure deployment schedules, permitting timelines, workforce availability, maintenance capacity, local government budget cycles, and long-range capital planning. Many of these factors remain outside the direct control of individual agencies while significantly

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influencing their ability to achieve compliance. Successful implementation must recognize these operational realities if regulatory expectations are to remain both practical and achievable.

Implementation likewise depends upon coordination among manufacturers, utilities, charging infrastructure providers, maintenance contractors, equipment suppliers, software providers, fuel providers, engineering firms, construction contractors, and numerous other public and private participants. Delays affecting any one of these stakeholders frequently ripple throughout the implementation process despite remaining beyond the control of regulated fleet organizations. Effective implementation should recognize that compliance outcomes are often influenced by circumstances extending well beyond the authority of the regulated entity.

Similarly, regulated organizations frequently have little or no direct control over contractor purchasing decisions, manufacturer production schedules, utility energization timelines, permitting delays, charging infrastructure construction, specialized vehicle availability, contractor reporting practices, or broader supply chain conditions. Each of these factors may significantly influence implementation outcomes despite remaining outside the authority of individual fleet organizations. Further, many public fleets rely on contracted fleet services. Extending ACF requirements to those contractors may cause smaller providers to stop serving public fleets rather than assume the additional regulatory burden, potentially compromising the delivery of essential public services. Administrative flexibility should therefore recognize the practical limitations under which regulated organizations must operate while maintaining the overall objectives of the regulation.

Public agencies and other regulated organizations also have a fiduciary responsibility to responsibly manage substantial investments in vehicles, charging infrastructure, maintenance facilities, workforce development, information systems, and supporting technologies. Those investments are intended to serve California's residents for many years. Stable implementation expectations allow organizations to maximize the value of those investments while remaining sufficiently flexible to respond to future legal, regulatory, technological, and market developments.

California's environmental objectives must likewise be achieved without compromising the delivery of essential public services. Public agencies remain responsible for emergency response, utility restoration, transportation infrastructure, public health, law enforcement, fire protection, disaster recovery, and statewide mutual aid regardless of evolving legal or regulatory circumstances. Implementation strategies should continue supporting these critical public responsibilities while advancing California's environmental goals.

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Accordingly, the implementation phase will require CARB to continue providing practical administrative flexibility whenever future judicial decisions, legislative actions, or regulatory developments materially affect implementation expectations. Reasonable planning horizons, timely administrative guidance, practical compliance procedures, and transparent implementation processes will strengthen both regulatory success and California's broader public service mission.

Implementation Partnerships Strengthen Regulatory Success

NAFA appreciates CARB's continued willingness to engage stakeholders throughout implementation of California's fleet transition programs and remains committed to serving as a constructive implementation partner as these programs continue to evolve.

Successful implementation depends upon sustained collaboration among CARB, regulated fleet organizations, manufacturers, utilities, infrastructure providers, vehicle suppliers, maintenance providers, contractors, technology companies, and numerous other stakeholders. Each participant contributes operational expertise that improves administrative efficiency, strengthens regulatory consistency, enhances implementation, and ultimately advances California's environmental objectives.

Fleet professionals provide a uniquely valuable implementation perspective because they are responsible for translating regulatory requirements into operational reality on behalf of the organizations they serve. Their experience encompasses procurement, infrastructure deployment, compliance administration, maintenance operations, contractor management, emergency preparedness, reporting systems, workforce development, operational resilience, and long-term asset management. That practical experience enables fleet organizations to identify implementation challenges that may not become apparent during the rulemaking process.

Recent stakeholder discussions demonstrate the value of involving experienced fleet professionals throughout implementation. Their operational experience can identify administrative and compliance challenges that may not become apparent until regulatory requirements are applied in actual operating environments. Continued engagement should therefore remain an essential component of implementation rather than simply a procedural step following adoption.

The implementation phase now requires CARB to use these discussions not merely to answer individual questions, but to identify recurring operational challenges, improve administrative

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guidance, refine compliance tools, strengthen reporting systems, and enhance long-term regulatory effectiveness. Addressing implementation issues early will reduce administrative burdens, improve statewide consistency, strengthen compliance, and minimize unnecessary disruption to essential public services.

Regulated organizations remain accountable for successful implementation regardless of whether operational challenges arise from vehicle availability, infrastructure deployment, contractor performance, utility coordination, reporting requirements, technology integration, manufacturer production schedules, or broader supply chain conditions. Their operational experience therefore provides valuable insight into implementation strategies that are both administratively workable and operationally sustainable.

NAFA's objective remains unchanged. We are not seeking to revisit the policy decisions reflected in these Second 15-Day Modifications. Rather, we seek to help ensure those decisions are implemented successfully, consistently, and sustainably by the organizations responsible for carrying them out. Continued collaboration between CARB and California's regulated fleet community remains one of the Board's most effective tools for identifying implementation challenges early, developing practical administrative solutions, and ensuring California's environmental objectives are successfully achieved in practice.

Moving Forward

NAFA appreciates CARB's continued efforts to provide regulatory clarity during a period of evolving legal and regulatory circumstances.

The Second 15-Day Modifications provide important clarification regarding the current applicability of California's vehicle emissions regulations while related legal proceedings continue. As the regulatory process transitions into implementation, however, the Board's continuing responsibility extends beyond clarifying regulatory language. Successful implementation will depend upon whether regulated organizations receive the administrative guidance, practical compliance tools, implementation certainty, and operational flexibility necessary to carry these requirements into day-to-day fleet operations.

California's regulated fleet organizations will continue delivering essential public services regardless of future judicial, legislative, or regulatory developments. Vehicle replacement decisions, infrastructure investments, procurement strategies, maintenance programs, contractor relationships, workforce development, and emergency response planning must all

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continue within the regulatory framework established by these regulations. Those responsibilities do not pause while legal or regulatory questions continue to evolve.

Ultimately, the success of California's environmental objectives will be measured not by the regulations themselves, but by whether they can be implemented consistently across thousands of diverse operating environments while maintaining reliable public services, emergency preparedness, operational resilience, and responsible stewardship of public resources. Successful implementation therefore serves both the regulated community and the State's long-term environmental goals.

The rulemaking phase has largely concluded, and the implementation phase has begun. CARB's timely guidance and continued engagement with regulated organizations will be critical to achieving California's environmental objectives while preserving essential fleet operations.

NAFA stands ready to continue working collaboratively with the Board, CARB staff, California's regulated fleet community, manufacturers, utilities, infrastructure providers, contractors, and other implementation partners to identify implementation challenges early, develop practical administrative solutions, and support the successful implementation of California's vehicle emissions programs.

Respectfully submitted,

Bill Schankel
Chief Executive Officer
NAFA Fleet Management Association