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Creating Efficient, Sustainable, Safe Fleets

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Submitted via CARB Electronic Comment System

California Air Resources Board
1001 I Street
Sacramento, California 95814

Comments on the Long-Term Implementation of California's Vehicle and Fleet Regulatory Framework Submitted in Response to the Third 15-Day Modifications

Dear Chair Sanchez and Members of the Board:

The NAFA Fleet Management Association (NAFA) respectfully submits these comments regarding the California Air Resources Board's (CARB) Third 15-Day Modifications. These comments supplement NAFA's earlier comments submitted in response to the Second 15-Day Modifications.

Although the current modifications are primarily technical and conforming in nature, they provide an appropriate opportunity to address the continuing administration and long-term implementation of California's vehicle and fleet regulatory framework. NAFA's recommendations are directed toward strengthening that implementation process rather than revisiting the underlying policy decisions reflected in the Advanced Clean Fleets regulation.

Executive Summary

NAFA appreciates the opportunity to comment on CARB's Third 15-Day Modifications. While these modifications are primarily technical and conforming in nature, they underscore an important reality: successful implementation of California's vehicle and fleet regulatory framework is an ongoing administrative process that will continue to evolve as operational experience accumulates.

NAFA is not requesting that the Board reopen or reconsider the underlying policy decisions reflected in the Advanced Clean Fleets regulation. Rather, we respectfully request that CARB continue strengthening the long-term administration of the program by:

1. Providing consistent, consolidated written implementation guidance as recurring compliance and operational questions arise.
2. Maintaining a transparent process for communicating administrative interpretations, implementation updates, and technical clarifications so that similarly situated regulated entities receive consistent guidance.

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3. Preserving institutional knowledge and administrative consistency throughout future staff, leadership, and organizational transitions.
4. Maintaining a regular, structured mechanism for engagement with regulated fleet organizations to identify implementation challenges, share operational experience, and improve administrative practices as implementation matures.

NAFA believes these administrative practices will strengthen regulatory consistency, improve long-term implementation, increase planning certainty for regulated fleet organizations, and support California's environmental objectives without reopening the policy decisions previously adopted by the Board.

The observations that follow explain the basis for these recommendations and are offered in the spirit of supporting the successful long-term implementation of California's vehicle and fleet regulatory framework.

I. Introduction

NAFA is the world's largest membership association representing professionals responsible for fleet and mobility management across the public, commercial, utility, educational, nonprofit, and private sectors. Collectively, NAFA members manage more than 4.8 million vehicles, oversee fleet assets exceeding $122 billion, and direct operations totaling more than 84 billion miles annually. Our membership includes professionals responsible for the acquisition, operation, maintenance, replacement, and strategic management of fleets serving every level of government, investor-owned and municipal utilities, public safety agencies, airports, ports, transit systems, educational institutions, contractors, service providers, and private industry throughout North America.

Fleet professionals occupy a unique position within California's regulatory framework. They are responsible not only for regulatory compliance, but also for ensuring that the vehicles and equipment entrusted to their organizations remain available to support the essential public services upon which California depends. Every day, they balance environmental compliance with emergency preparedness, public safety, utility restoration, infrastructure maintenance, fiscal stewardship, workforce management, procurement, capital planning, and uninterrupted operational readiness. Those responsibilities continue regardless of changing regulatory requirements, evolving technologies, natural disasters, economic conditions, or changes in governmental leadership.

Accordingly, NAFA's perspective extends beyond the interpretation of regulatory language. Our members are responsible for translating regulatory requirements into procurement decisions, capital planning, infrastructure development, contractor oversight, emergency preparedness,

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budgeting, workforce management, and long-term asset replacement. Their experience provides a practical understanding of how regulatory requirements function once they move beyond rulemaking and into day-to-day implementation.

NAFA has consistently supported practical, achievable policies that improve environmental performance while recognizing the operational realities of fleet management. We recognize the substantial effort CARB has devoted to developing the ACF regulation and appreciate the professionalism and accessibility demonstrated by CARB staff throughout this rulemaking. These comments are not intended to revisit policy decisions already made by the Board. Rather, they are offered to help ensure that California's environmental objectives are implemented through an administrative program that remains consistent, transparent, and responsive as implementation proceeds.

Although the Third 15-Day Modifications primarily address technical and conforming revisions, they nevertheless demonstrate an important characteristic of complex regulatory programs: implementation does not end when regulations are adopted. As regulated organizations begin applying regulatory requirements under actual operating conditions, practical implementation questions, technical clarifications, and administrative refinements naturally continue to emerge. Those continuing refinements underscore the importance of maintaining a mature implementation program capable of providing consistent administrative guidance as operational experience develops.

That reality was reinforced during the June 30, 2026 implementation discussion requested by NAFA and conducted between CARB staff and NAFA's California government fleet members. The discussion focused on practical operational issues involving contractor relationships, mutual aid, governmental service arrangements, reporting obligations, emergency operations, and other implementation questions arising as experienced fleet professionals prepared to implement the regulation. While CARB staff provided guidance where possible, several issues appropriately required additional consideration, and both CARB staff and participating fleet professionals recognized that continued implementation discussions would be beneficial as operational experience develops.

Viewed together, the Third 15-Day Modifications and the June 30 implementation discussion demonstrate that California's fleet transition has entered a new administrative phase. The continued refinement reflected in these Third 15-Day Modifications illustrates that implementation is not a static process. Rather, it is an evolving administrative effort in which practical operational experience, technical clarification, and consistent implementation practices continue to strengthen the effectiveness of California's broader vehicle and fleet regulatory framework. Rulemaking establishes the regulatory framework. Implementation

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determines how effectively that framework functions under actual operating conditions. As implementation progresses, operational experience will continue identifying circumstances requiring administrative interpretation, consistent application, and informed judgment. The long-term success of the ACF regulation will therefore depend not only upon the quality of the regulations adopted by the Board, but also upon the quality, consistency, and maturity of the implementation program that supports them.

Accordingly, these comments focus less on the specific revisions contained within the Third 15-Day Modifications than on the continuing administrative processes that accompany successful implementation. NAFA respectfully submits that the long-term success of the ACF regulation will ultimately be measured not only by the regulations themselves, but by the effectiveness of the administrative program responsible for implementing them. The observations that follow are offered in that spirit and are intended to assist the Board in strengthening the long-term administration of one of the nation's most significant fleet regulatory programs.

II. From Rulemaking to Continuing Administration

The Third 15-Day Modifications, together with the June 30 implementation discussion between CARB staff and NAFA's California government fleet members, reflect an important transition in the administration of the Advanced Clean Fleets regulation. The principal challenge is no longer developing the regulatory framework. It is ensuring that the regulation is administered consistently and effectively throughout its long-term implementation.

This distinction is fundamental. Rulemaking establishes policy, defines legal obligations, and creates a compliance framework. Implementation tests that framework under actual operating conditions. As regulated organizations begin applying the regulation to real-world circumstances, operational questions that could not reasonably have been anticipated during rulemaking will inevitably emerge. That progression should not be viewed as a weakness in the regulation. Rather, it reflects the normal evolution of every significant regulatory program.

The June 30 implementation discussion demonstrated this principle in practical terms. Experienced fleet professionals presented operational issues involving contractor relationships, governmental service arrangements, mutual aid responsibilities, reporting obligations, and other situations encountered as organizations prepared to implement the regulation. Some questions could be addressed immediately. Others appropriately required additional consideration or future discussion. Most importantly, the meeting demonstrated that implementation is not a static event, but an ongoing administrative process that benefits from continuing dialogue between CARB and the organizations responsible for carrying the regulation into practice.

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The implications extend well beyond the individual issues discussed during that meeting. Public fleet organizations throughout California operate under different statutory authorities, governance structures, procurement practices, funding mechanisms, emergency response responsibilities, and contractual relationships. As implementation continues, additional organizations will inevitably encounter operational circumstances requiring administrative interpretation or clarification. Those circumstances should be expected. They are the natural consequence of applying a comprehensive statewide regulation across thousands of organizations performing widely differing public and commercial functions.

Accordingly, the relevant question is no longer whether every implementation issue has already been identified. No regulatory program of this magnitude can reasonably achieve that objective. The more appropriate question is whether California's implementation program is prepared to respond to emerging issues consistently, transparently, and efficiently as operational experience accumulates.

NAFA respectfully submits that this transition carries important implications for the continuing administration of the regulation. Completion of the rulemaking marked the beginning of a new implementation phase in which consistent administrative interpretation, practical guidance, transparency, and ongoing engagement with regulated fleet organizations become increasingly important to successful long-term implementation.

The administrative needs of this implementation phase extend beyond enforcement. They include maintaining consistent administrative interpretations, providing practical implementation guidance, preserving institutional knowledge, promoting transparency in compliance expectations, and maintaining productive engagement with the regulated fleet community. These activities are not ancillary to the regulation itself. They are integral to effective regulatory administration and to achieving consistent statewide implementation.

This responsibility is particularly significant because implementation decisions influence long-term planning. Public agencies and private fleet organizations routinely make procurement decisions, infrastructure investments, financing commitments, workforce plans, and capital expenditures that remain in effect for many years. Those decisions require more than regulatory certainty. They require confidence that California's implementation program will continue providing consistent administrative interpretation and predictable guidance as new operational questions emerge.

This distinction is perhaps best understood by differentiating between regulatory completeness and administrative maturity. Regulatory completeness reflects the adoption of the legal framework governing compliance. Administrative maturity reflects the continuing development

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of guidance, institutional knowledge, administrative processes, and consistent interpretations necessary to administer that framework successfully over time. While the Third 15-Day Modifications strengthen the regulatory framework, administrative maturity will continue to develop as practical implementation experience accumulates.

Ultimately, California's environmental objectives will not be achieved solely because regulations have been adopted. They will be achieved because those regulations are administered consistently across thousands of regulated organizations over many years. The quality of that administration will become every bit as important as the quality of the regulations themselves.

Successful implementation should therefore be viewed not as a fixed endpoint reached upon adoption of the regulation, but as a continuing administrative process. As implementation matures, the effectiveness of California's implementation program will increasingly be measured by its ability to provide consistent interpretation, transparent administration, practical guidance, and the confidence necessary for regulated organizations to plan, invest, and comply while continuing to deliver the essential public services upon which California depends.

The June 30 implementation discussion requested by NAFA reinforces this point. Together, that discussion and the Third 15-Day Modifications demonstrate that California's vehicle regulatory framework has entered a continuing implementation phase in which consistent administration, practical guidance, and ongoing engagement with regulated fleet organizations will become increasingly important to achieving the Board's long-term objectives.

III. Implementation Governance: The Continuing Responsibility of Administration

The transition from rulemaking to implementation necessarily expands the administrative demands associated with successful implementation. During the rulemaking process, the Board's principal responsibility was to establish the regulatory framework governing California's fleet transition. As that framework moves into implementation, however, the focus necessarily shifts from regulatory development to regulatory administration.

A regulation does not become successful simply because it has been adopted. It becomes successful when regulated organizations can apply it consistently to real-world operations while continuing to fulfill the public responsibilities entrusted to them. That distinction is particularly important for a program affecting thousands of public and private fleet organizations operating under widely differing statutory authorities, operational missions, governance structures, procurement practices, funding mechanisms, and contractual relationships. No regulation,

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regardless of how carefully developed, can reasonably anticipate every operational circumstance that will arise throughout its implementation.

The June 30 implementation discussion reinforced this reality. The questions presented by NAFA's California government fleet members were not hypothetical. They reflected practical operational issues encountered as organizations prepared to implement the regulation within existing governmental and contractual frameworks. Those discussions demonstrated that experienced fleet professionals possess operational knowledge that complements the regulatory expertise of CARB staff. Together, those perspectives strengthen implementation by identifying issues that only become apparent when regulatory requirements are applied under actual operating conditions.

For that reason, implementation should not be viewed simply as a period during which individual questions are answered as they arise. It should be viewed as the continuing administration of a complex statewide regulatory program. As implementation progresses, operational experience will continue identifying opportunities to improve administrative consistency, clarify expectations, and strengthen the effectiveness of the implementation program without altering the policy decisions already made by the Board.

This distinction is significant because successful implementation is necessarily a shared endeavor. Regulated organizations are responsible for complying with the regulation. Successful implementation, however, also depends upon consistent, transparent, and predictable administration. These complementary functions reinforce one another. Consistent compliance depends upon consistent administration, and effective administration depends upon an understanding of how regulatory requirements function within the operational environments they govern.

Effective implementation governance encompasses considerably more than enforcement or responding to individual requests for clarification. It includes maintaining consistent administrative interpretations, preserving institutional knowledge, communicating implementation expectations clearly, incorporating operational experience where appropriate, and ensuring that similarly situated organizations receive consistent administrative treatment. These responsibilities are not separate from the regulation; they are essential components of its long-term success.

Planning certainty is equally important. Public agencies and private fleet organizations cannot postpone procurement decisions, infrastructure investments, facility improvements, workforce planning, financing arrangements, or capital expenditures while implementation questions continue to evolve. Those decisions must continue throughout implementation. Consequently,

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California's implementation program should provide regulated organizations with confidence that administrative interpretations will remain consistent and that emerging implementation issues will be addressed through a transparent and predictable process.

Ultimately, implementation governance should be measured not by the absence of implementation questions, but by the effectiveness of the administrative program in resolving those questions consistently and professionally. Questions will continue to arise as technology advances, markets evolve, operational experience grows, and new factual circumstances emerge. That is the natural progression of any significant regulatory program. The measure of success is whether the implementation program continues becoming stronger through that experience.

The Third 15-Day Modifications and the June 30 implementation discussion together demonstrate that California has entered this new phase. While the regulatory framework has been established through rulemaking, the long-term success of the program will depend upon the continued maturation of the implementation program through consistent administration, transparent guidance, preservation of institutional knowledge, and ongoing engagement with regulated fleet organizations.

IV. Building a Durable Implementation Program

The continuing responsibilities discussed above extend well beyond the implementation issues presently before the Board. California's fleet transition will continue evolving for many years as vehicle technologies advance, infrastructure expands, markets mature, operational practices evolve, and new implementation challenges emerge. During that time, Governors, Board Members, Executive Officers, and agency personnel will naturally change. Those transitions are an inherent part of public administration. The responsibility for implementing the ACF regulation, however, will remain constant.

California's regulated fleet organizations will continue replacing vehicles, constructing infrastructure, negotiating contracts, planning capital investments, training personnel, maintaining emergency readiness, and delivering the essential governmental and commercial services upon which the State depends. Their planning horizons routinely extend well beyond individual budget cycles, administrations, or agency leadership transitions. Successful implementation therefore cannot depend upon the continuity of individual personnel or informal institutional practices. It must be supported by an implementation program that is durable, consistent, and capable of maintaining continuity throughout the life of the regulation.

Implementation knowledge will likewise continue evolving. The June 30 discussion demonstrated that experienced fleet professionals encounter practical operational

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circumstances that may not become apparent during the rulemaking process. As implementation progresses, additional organizations will inevitably identify new factual situations involving procurement, contractor relationships, emergency response, infrastructure deployment, reporting obligations, and other operational issues. Those experiences should not simply resolve individual questions. They should strengthen California's overall administrative framework.

Accordingly, successful implementation requires more than resolving questions as they arise. It requires preserving institutional knowledge. Administrative interpretations should be documented. Guidance should evolve as operational experience develops. Recurring implementation issues should be incorporated into future administrative practices so that similarly situated organizations receive consistent treatment regardless of when or where those questions arise.

This is not simply an administrative preference. It is an essential element of effective public administration. Regulated organizations make significant financial and operational decisions based upon their understanding of how regulatory programs will be administered over time. Procurement strategies, infrastructure investments, financing arrangements, workforce planning, facility improvements, and long-term capital decisions all depend upon reasonable confidence that administrative interpretations will remain stable, transparent, and consistently applied.

For that reason, California's implementation program should become progressively stronger through experience. The objective should not simply be to answer implementation questions, but to ensure that each significant implementation issue contributes to a more mature, more consistent, and more effective administrative program. In that respect, implementation should be viewed as a process of continuous institutional improvement rather than a series of isolated administrative decisions.

The Board has already demonstrated this philosophy during the rulemaking process itself. The Third 15-Day Modifications themselves illustrate this continuing process by refining regulatory language where additional technical clarification and administrative workability have proven beneficial. The implementation phase should reflect that same commitment to continuous improvement. As operational experience identifies opportunities to improve administrative guidance, implementation practices, communication, or interpretive consistency, those improvements should become part of California's ongoing administrative framework itself rather than remaining dependent upon individual discussions or personnel.

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Such an approach benefits both regulated organizations and the Board. It promotes more consistent statewide administration, reduces unnecessary uncertainty, preserves institutional knowledge despite inevitable personnel changes, improves administrative efficiency, and strengthens public confidence that comparable operational circumstances will receive comparable administrative treatment.

Ultimately, the long-term credibility of the ACF regulation will depend not only upon the regulations adopted by the Board, but upon the durability of the administrative program responsible for implementing them. A successful implementation program is one that continues to mature as experience accumulates, remains consistent through future leadership transitions, and provides regulated organizations with the confidence necessary to make responsible long-term operational decisions while continuing to achieve California's environmental objectives.

California has shown national leadership in developing ambitious environmental regulations. The implementation phase now presents an equally important opportunity to demonstrate leadership in regulatory administration by ensuring that the implementation program becomes more disciplined, more consistent, and more effective with each year of operational experience. Long-term regulatory credibility depends as much upon disciplined administration as it does upon sound rulemaking.

V. Measuring Long-Term Success

Throughout this rulemaking, considerable attention has appropriately focused on developing California's regulatory framework. Through successive revisions, including these Third 15-Day Modifications, the Board has continued refining the regulatory language to improve clarity, consistency, and administrative workability. Those efforts have established the legal foundation upon which California's fleet transition will proceed. The implementation phase now presents a different challenge: ensuring that this framework is administered with the same discipline, consistency, and commitment that characterized its development.

As the ACF regulation moves from regulatory development into day-to-day application, the measure of success necessarily changes. The question is no longer whether California has adopted a comprehensive regulatory framework. The question now is whether that framework can be administered consistently across thousands of regulated fleet organizations operating under diverse legal authorities, operational missions, contractual relationships, and public responsibilities over many years.

Successful implementation should not be judged by whether every operational circumstance was anticipated during rulemaking. It should be judged by how effectively the administrative program responds as new circumstances emerge. No regulatory program of this magnitude can

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reasonably anticipate every operational circumstance before implementation begins. Instead, implementation should be judged by the ability of the administrative program to respond to new circumstances consistently, transparently, and predictably as operational experience accumulates.

Implementation maturity is demonstrated through effective administration. It is reflected in consistent administrative interpretations, practical guidance, preservation of institutional knowledge, transparent communication, and a continuing willingness to strengthen implementation as experience identifies opportunities for improvement. Equally important, it is reflected in the confidence regulated organizations have that they can continue making long-term operational decisions while maintaining compliance with California's environmental objectives.

This standard is particularly important because implementation will continue long after the current rulemaking has concluded. Future Board Members, Executive Officers, agency leadership, and staff will inherit responsibility for administering this regulation. The strength of California's implementation program should therefore not depend upon individual personnel. It should rest upon durable administrative practices capable of maintaining consistency, transparency, and institutional continuity throughout the life of the program.

VI. Conclusion

The preceding discussion leads to a straightforward conclusion. Throughout these comments, NAFA has sought to distinguish between completion of the rulemaking and the continuing responsibilities associated with implementation. The Third 15-Day Modifications, together with the June 30 implementation discussion requested by NAFA, demonstrate that California's vehicle and fleet regulatory framework has entered a continuing implementation phase in which practical operational experience, technical refinement, and consistent administrative practices will continue strengthening long-term implementation.

NAFA does not offer these comments to revisit policy decisions already made by the Board. Rather, we offer the perspective of the professionals responsible for implementing these regulations every day within the complex realities of fleet management. Our objective is to help ensure that California's implementation program remains sufficiently disciplined, transparent, and responsive to support both successful regulatory compliance and the uninterrupted delivery of the essential public services upon which millions of Californians depend.

California has long demonstrated national leadership in environmental policy. The implementation phase now presents an equally important opportunity to demonstrate leadership in regulatory administration. By continuing to strengthen administrative consistency,

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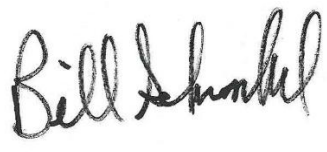
preserve institutional knowledge, maintain constructive engagement with regulated fleet organizations, and refine implementation as practical experience develops, the Board can establish an implementation program that serves as a national model for the administration of complex environmental regulations.

NAFA believes that effective implementation and successful achievement of California's environmental objectives are complementary goals. A mature implementation program strengthens both regulatory compliance and public confidence in the long-term success of the Advanced Clean Fleets regulation.

Ultimately, the enduring legacy of the Advanced Clean Fleets regulation will not be determined solely by the regulations adopted during this rulemaking. It will be determined by the quality, consistency, transparency, and maturity of the administrative program that supports those regulations throughout their implementation. The continuing implementation of that administrative program will ultimately help define the enduring success of the Advanced Clean Fleets regulation.

NAFA appreciates the opportunity to comment on the Third 15-Day Modifications. While these comments extend beyond the specific technical revisions contained in this notice, they are offered because those revisions reflect the continuing evolution of California's vehicle and fleet regulatory framework as implementation progresses. NAFA respectfully submits that maintaining consistent administrative guidance, preserving institutional knowledge, fostering constructive engagement with regulated fleet organizations, and promoting transparent implementation practices will strengthen both the effectiveness of the current modifications and the long-term success of the Advanced Clean Fleets regulation.

Respectfully submitted,



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