



April 17, 2026

Dr. Steven Cliff
Executive Officer

California Air Resources Board

Submitted electronically via <https://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Comments on April 2, 2026 15-Day Notice of Proposed Changes to the Advanced Clean Fleets Regulation

Dear Dr. Cliff,

Thank you for the opportunity to comment on the 15-day Changes to the Proposed Regulation Order – Advanced Clean Fleets Regulation, issued on April 2, 2026. I am writing on behalf of Recology, one of the leading recycling, composting and waste collection companies in the state.

Recology and its over 30 California subsidiaries operate a fleet of over 2,000 vehicles in the state. We service over 85 communities throughout Northern California, ranging from major cities and suburban communities to remote rural areas. We trace our roots back more than 100 years.

We have reviewed the proposed amended text and **request that the regulation be revised to clarify that privately owned fleets performing services under contract with public agencies are not subject to the SLG Fleet compliance obligations.**

Specifically, the definition of “Waste fleet” in Section 2013(b) should be revised to strike the following:

“(B) A fleet owner that is contracted with a municipality via franchise agreement or long-term contract, with either a minimum length of ten years or more, or with a minimum length of three years but includes a renewal provision when satisfying the contract terms.”

The inclusion of private waste fleets contracted to a municipality within the “waste fleet” definition (which is only used in the “waste fleet” compliance option under 13 CCR § 2013.6(e) for fleet owners choosing the ZEV Milestones Option) could create the misimpression that contracted private fleets have a ZEV milestone compliance obligation. Because the regulations do not apply to private fleets, subsection (B) of the “waste fleet” definition is rendered meaningless and should be deleted. If it remains in the regulations, it will serve only to create confusion for local governments and private haulers as they navigate their regulatory and contractual obligations.

The regulatory text supports this requested deletion and is also clear that private waste fleets are not subject to the SLG Fleet regulations. 13 CCR § 2013(a) states that the SLG Fleet provisions apply only to a “state or local government agency with jurisdiction in California that owns, leases, or operates” covered vehicles. The regulations are also clear that there is no requirement for governmental entities to require their contracted fleets to meet the ACF ZEV adoption requirements. Under Section 2049(c), SLGs only obligation is to either verify the fleet is listed as compliant on the ACF webpage **or** obtain a signed statement from the hired fleet that they are not

subject to the ACF regulations. Inclusion of the option to provide a signed statement attesting that the hired entity is not subject to the regulation conclusively demonstrates that governmental agencies do not need to require their contractors to comply with the ACF SLG Fleet requirements.

Thank you for considering these comments. If you have any questions, please do not hesitate to contact me at jmangin@recology.com.

Respectfully,

A handwritten signature in cursive script that reads "Julia Mangin".

Julia Mangin
Director, Sustainability & Government Affairs
Recology