



April 17, 2026

Dr. Steven Cliff, Executive Officer  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

**RE: Proposed 15-day Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations**

Dear Dr. Cliff,

Waste Management of California, Inc., (WM) is a leading provider of comprehensive environmental services, specializing in the collection, transportation, recycling, and disposal of waste. WM serves customers across California, from Alturas to San Diego. WM is also a major operator of recycling centers, compost facilities, landfills, and landfill-based renewable energy projects, helping convert waste into usable resources such as recycled materials and renewable energy. Through these services, WM plays a critical role in supporting public health, environmental protection, and sustainable materials management. WM is committed to sustainability across our operations.

WM operates the largest trucking fleet in the solid waste collection industry, including a significant number of vehicles operating on low-NOx engines. WM has a long history of working with the California Air Resources Board (CARB), local air districts, and our local government customers to advance vehicle technology, including renewable natural gas and zero-emission technology. For example, WM has spent the last several years trying to get electric vehicle charging infrastructure permitted, built, and commissioned at our hauling locations in Los Angeles and San Diego counties. Given the importance of fleet rules to WM, WM engaged extensively with CARB during the development of the Advanced Clean Fleets (ACF) High Priority Fleets (HPF) Rule.<sup>1</sup>

It is with this context that we would like to express our extreme disappointment with the process by which CARB brought forth the 15-day amendments, including the proposed change to the definition of “waste fleet,” as well as recent interpretations of the State and Local Government (SLG) Fleet Rule by CARB staff. Several communications from CARB suggest the scope of the rule could be expanded to require state and local governments to account for the emissions from private fleets performing services under contract to them.<sup>2</sup> A scope expansion of this magnitude is a clear violation of the Administrative Procedures Act (APA).

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<sup>1</sup>One example of WM’s comments on the ACF HPF rule are located here:

<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/192-acf2022-UGJITZVxvUDEBKgMy.pdf>

<sup>2</sup> The email contained in Attachment 1 is just one venue through which CARB has communicated its interpretation, which is supported by neither the rulemaking history nor existing law.

WM cannot find any evidence in the record that CARB had previously intended to expand the scope of the SLG to require state and local governments to account for private waste fleets in their compliance obligations, including in the September 25, 2025 Board hearing transcript, adopted Resolution 25-9, or the 45-day rulemaking package. At no time since the September hearing was WM, despite operating one of the largest solid waste collection fleets in California, engaged by CARB about its intent to expand application of the SLG Fleet requirements. CARB's proposed amendment will more than likely impact a vast majority of the State's long-term franchise agreements and potentially require significant expenditures on vehicles and infrastructure, increasing costs for consumers and the public.

In addition to process concerns, CARB's proposal creates unworkable implementation problems for fleets performing contracted services. Contracted service providers, like WM, will have no real visibility into the fleet makeup of municipal customers or their compliance plans. Nor will contracted service providers like WM be able to reasonably plan for the transition to zero-emission vehicles and infrastructure to keep in sync with each individual customers' own SLG compliance strategies.

Further, the proposed changes will increase the cost of solid waste collection services at a time Californians are already struggling with our State's high cost of living and local governments grapple with budget issues. We do not believe a policy shift of this magnitude was properly communicated to the regulated public, least of all private fleets providing public services like WM who have historically engaged with CARB in good faith on the ACF HPF provisions.

Lastly, in addition to these points, WM wholeheartedly endorses the comment letter on the 15-Day Notice and Regulatory Amendments submitted by the Resource Recovery Coalition of California, California Waste and Recycling Association, Solid Waste Association of Orange County, Inland Empire Disposal Association, and Los Angeles County Waste Management Association (Waste Industry Coalition Letter) and incorporates the points made therein by reference.

Thank you,



Christine Wolfe  
Director of Government Affairs, California, Hawaii, Nevada  
WM

***Attachment 1 – Email from CARB staff (ARB ZEV Fleet) to Jon Costantino***

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