



April 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted via California Air Resources Board Comment Portal

Subject: Public Comment on the Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations

To Whom it May Concern,

The City of Martinez (the "City") appreciates the opportunity to comment on the proposed amendments to the Advanced Clean Fleets ("ACF") and Low Carbon Fuel Standard regulations. We share the California Air Resource Board's ("CARB") overarching goals to reduce emissions and accelerate the transition to cleaner vehicle technologies. However, the City has significant concerns with the proposed expansion of the definition of "waste fleet" and the associated compliance structure.

Subjecting privately operated franchise waste fleets to the State and Local Government requirements would impose substantial and immediate cost burdens on ratepayers without a corresponding and achievable path to compliance. Doing so creates significant cost burdens for ratepayers, due to the higher cost of zero-emission trash collection trucks, and the need for additional vehicles in many situations, which is particularly troubling during the current economic climate and since the City is about to negotiate a new or amended franchise agreement for solid waste services. The City also understand the solid waste industry faces serious practical barriers to compliance, including limited vehicle availability, long lead times, and the absence of commercially available zero-emission trucks for several mission-critical applications.

Current battery based, zero-emission collection vehicles typically have very high per-axle weights – which is a leading cause of damage to local roads. Repairing and repaving these roads comes with significant greenhouse gas emission as well as cost impacts.

The City expects technological advances to eventually address the weight and associated road damage issue. Accordingly, the City respectfully requests CARB defer or modify these regulations until vehicle availability, reliability, weight reduction, and supporting infrastructure are demonstrably sufficient to support statewide implementation.

Sincerely,



Michael Chandler

City Manager

C: Mayor and City Council
Steve Devine, Senior Management Analyst
Michael P. Cass, Assistant Community and Economic Development Director
Kerry Rivers, Management Analyst