



FAIRFIELD-SUISUN SEWER DISTRICT

April 17, 2026

The Hon. Lauren Sanchez (Chair) & Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via [CARB Comment Portal](#)

RE: Fairfield-Suisun Sewer District Comments on the 15-Day Amendments to the Advanced Clean Fleets Regulation

Chair Sanchez and Members of the Board:

Fairfield-Suisun Sewer District (FSSD) appreciates the opportunity to comment on the California Air Resources Board's (CARB's) proposed amendments to the Advanced Clean Fleets (ACF) Regulation released April 2, 2026 (referred herein as 15-Day Changes).

FSSD is a California special district that provides wastewater collection and treatment services for a population of approximately 150,000 in the Cities of Fairfield and Suisun City in northern California. FSSD is a member of the California Association of Sanitation Agencies (CASA) and supports CASA's 4/17/2026 comment letter and incorporates it by reference.

One area of particular concern to FSSD is the limitations on the use of biogas, which is continuously produced, and has the ability to support multiple environmental goals. FSSD is currently exploring a co-digestion project with a private entity and the limitations on the ability to use the biogas as biofuel can have significant impacts on this and any future co-digestion projects.

As a public agency charged with protecting public health and the environment, we are committed to responsible stewardship and regulatory compliance. However, our resources are finite, and we must continually balance long-term regulatory obligations with the need to respond effectively to emergencies and urgent system demands. Certain provisions of the proposed regulations may inadvertently constrain our ability to act quickly in these situations. Moreover, the anticipated environmental benefits do not appear commensurate with the significant costs and resources required for implementation. We respectfully urge consideration of CASA's request for additional stakeholder engagement on some of these critical changes. FSSD hopes to work with CARB and others on a more balanced approach that preserves both environmental protections and the operational flexibility necessary to serve our community effectively.

Fairfield-Suisun Sewer District Comments on the 15-Day Amendments to the Advanced
Clean Fleets Regulation

Page 2 of 2

Thank you for your consideration of these comments. FSSD generally supports the goals of the ACF regulations, particularly where they are practical and effective in protecting the environment. However, we need the flexibility to respond to emergencies and fully perform our duties to protect public health and the environment. Please contact Amanda Roa at (707) 428-9159 or aroa@fairfieldsuisunsewer.ca.gov if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jordan Damerel".

Jordan Damerel
General Manager






ACF 15-Day Amend FSSD Comment Letter

Final Audit Report

2026-04-17

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