

April 17, 2026

Chair Lauren Sanchez
Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Support for 15-Day Modifications to the Advanced Clean Fleets Regulation – Hiring Compliant Fleets

Dear Chair Sanchez and Members of the Board,

Symbio North America appreciates the opportunity to submit comments in support of the 15-day modifications to the Advanced Clean Fleets (ACF) Regulation released on April 2, 2026. We commend the California Air Resources Board (CARB) for its continued leadership in advancing equitable, enforceable, and outcome-driven clean transportation policy, and for providing additional clarity to support effective implementation of the ACF program.

Symbio North America supports the proposed amendments because they provide fleet operators, contractors, public agencies, and investors with more clear and unambiguous guidance on compliance obligations. In particular, the clarification and consolidation of hiring-entity responsibilities—including the creation of Section 2049, Hiring Compliant Fleets—offers important regulatory certainty regarding how ACF requirements apply when public entities rely on contracted fleet services.

Clarifying that compliance obligations are tied to the performance of public services, rather than solely to fleet ownership structure, strengthens the consistency and predictability of the ACF framework. This approach helps ensure that emissions reductions are achieved where vehicles operate and where communities experience air quality impacts, while giving public agencies and their contractors clear direction on how to plan for compliance.

By establishing uniform expectations for fleets providing services to state and local governments, the proposed amendments:

- Promote consistent application of ACF requirements across service delivery models,
- Reduce uncertainty for contractors and public agencies entering long-term service agreements, and
- Support durable emissions reductions in communities disproportionately impacted by heavy-duty vehicle activity.

Symbio North America believes these clarifications align squarely with the intent of the ACF regulation and long-standing principles of environmental accountability.

From the perspective of companies developing and deploying zero-emission vehicles and clean energy technologies, regulatory clarity and consistency are essential. Clear guidance on compliance responsibilities enables more accurate planning, supports long-term investment decisions, and allows both public agencies and private contractors to engage the market with confidence.

The 15-day modifications send an important signal that:

- ACF requirements apply based on the services being performed,
- Public procurement and contracting decisions must align with California's emissions reduction goals, and
- Compliance expectations will be applied consistently across regulated activities.

This clarity is especially important as California continues to scale zero-emission technologies across medium- and heavy-duty applications, where fleet transitions require long planning horizons and substantial capital investment.

Symbio North America further notes that the proposed amendments are consistent with California's broader climate, air quality, and environmental justice objectives. Providing clear compliance pathways for contracted services helps prevent emissions displacement and supports improved air quality outcomes for communities that rely heavily on municipally contracted services such as waste, recycling, public works, and utilities.

We appreciate CARB's careful approach in clarifying these provisions without expanding the scope of the regulation beyond its intended application, while still strengthening enforceability and implementation certainty.

In conclusion, Symbio North America supports the 15-day modifications as proposed and applauds CARB for providing clearer guidance to public agencies, contractors, and market participants. We respectfully encourage the Board to finalize these amendments and to continue offering transparent direction to support effective ACF implementation.

Symbio North America remains committed to partnering with the State of California, local governments, and industry stakeholders to accelerate the deployment of zero-emission transportation and clean energy solutions in support of ACF and California's long-term climate goals.

Thank you for your leadership and consideration.

Sincerely,



Juan Andres Garza
Site Director
Symbio North America Corporation