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CIVIL TRIAL PRACTICE
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April 27, 2026

Via E-mail

Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comment on 15-Day Notice of Proposed Changes to the
Advanced Clean Fleets Regulation (ACF) - State and Local Government Fleet
Provisions

Dear Dr. Cliff:

Thank you for this opportunity to submit comment on the pending proposed amendments to the State and Local Government Fleet provisions of the Advanced Clean Fleets (“ACF”) regulation that the Board issued on April 2, 2026 for a 15-day comment period. I represent Consolidated Disposal Service, L.L.C., Allied Waste Systems, Inc., and Republic Waste Services of Southern California, LLC and their affiliated entities providing solid waste handling services to state, regional and local agencies throughout the state.

We have had the opportunity to review and hereby adopt the comments on the proposed changes to the ACF submitted by other parties, including the April 16, 2026 League of California Cities and the April 17, 2026 Coalition comment letters of trade associations (Resource Recovery Coalition of California; California Waste and Recycling Association; Solid Waste Association of Orange County, Inland Empire Disposal Association; and the Los Angeles County Waste Management Association) whose members are companies providing essential services through contracts with state and local governments.

My clients have made substantial investments in successful sustainability initiatives and maintain a continued commitment to the goal of clean fleets, but due to the uncertainty involved with the proposed ACF change and its impacts on contracting agencies and customers served expressly adopt and incorporate the League of California Cities and Coalition comments on the ACF changes by reference as though fully set forth herein.

Thank you for your consideration of these comments.

Very truly yours,



Scott W. Gordon

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