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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,

HF&H Consultants, LLC (HF&H) appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleets (ACF) and Low Carbon Fuel Standard regulations. HF&H is a statewide leader in advising local governments on solid waste franchise agreements, with decades of experience helping agencies implement environmental policy in a manner that is technically feasible, fiscally responsible, and equitable for ratepayers.

We share CARB's overarching goals of reducing emissions and accelerating the transition to cleaner vehicle technologies. However, based on our extensive work with local agencies and solid waste service providers across California, we have significant concerns with the proposed expansion of the definition of "waste fleet" and the associated compliance structure. We believe this may unintentionally undermine both environmental and public-service outcomes if implemented as currently drafted.

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—approximately twice that of internal combustion vehicles—and the need for additional vehicles in many environments to perform the same amount of work due to performance limitations from increased weight during the duty cycle. More critically, the solid waste industry continues to face 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.

Additionally, the contract terms appear to be structured to ensure an adequate remaining term for asset depreciation. Unfortunately, this definition creates perverse incentives for local governments and service providers to avoid compliance by gaming the contract term. If local agencies begin issuing five-year contract terms for solid waste collection, they will avoid the zero-emission vehicle transition, create inefficient capital cycles that impact ratepayers, and service providers will benefit from incumbency advantages that frustrate competition in these critical public services.



We respectfully recommend that CARB defer or modify applicability to privately operated franchise fleets until vehicle availability, reliability, and supporting infrastructure are demonstrably sufficient to support statewide implementation.

* * * *

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Hilton', written in a cursive style.

Rob Hilton
President