



April 17, 2026

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

Re: Comments on the 15-Day Amendments to the Advanced Clean Fleets Regulation

Submitted via: ZEVFleet@arb.ca.gov

Chair Sanchez and Members of the California Air Resources Board:

Clean Water SoCal appreciates the opportunity to comment on the proposed 15-Day Amendments to the Advanced Clean Fleets (ACF) Regulation, dated April 2, 2026. Our members support the California Air Resources Board's mission to protect public health, welfare, and ecological resources through effective reductions in air pollutants, while recognizing and considering effects on the economy.

However, as currently structured, the ACF regulation undermines our members' ability to protect public health and the environment. For this reason, Clean Water SoCal cannot support an ACF framework that applies solely to public fleets.

Clean Water SoCal represents more than 80 public water and wastewater agencies across Southern California, serving approximately 20 million residents in San Diego, Orange, Los Angeles, Santa Barbara, Riverside, San Bernardino, and Ventura counties. Our wastewater agencies collectively manage over two billion gallons of wastewater daily in an environmentally responsible and cost-effective manner, transforming wastewater into valuable resources such as recycled water and renewable energy.

As we have consistently communicated since 2022, our members have significant concerns regarding the regulation's restrictive requirements—particularly given that private fleets are not subject to the same standards. Key concerns include:

- Insufficient charging infrastructure;
- Limited availability of necessary zero-emission vehicles (ZEVs) from manufacturers;



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- Challenges in obtaining timely exemptions or extensions when vehicles or infrastructure are unavailable;
- The absence of a meaningful long-term pathway to utilize renewable, non-fossil fuels generated at wastewater treatment facilities to support food waste recycling mandates under SB 1383;
- Constraints affecting contract fleets; and
- Economic impacts that will ultimately be borne by ratepayers, exacerbating affordability challenges.

While we support efforts to reduce emissions from the transportation sector, the ACF regulation is currently applied to public fleets, which represent only about 7 percent of California’s medium- and heavy-duty vehicles—limiting its effectiveness while imposing disproportionate burdens on public agencies. This approach undermines the reliability of essential water and wastewater services.

We appreciate CARB staff’s efforts to provide some relief for public fleets through these amendments. However, the proposed changes do not adequately address the operational challenges facing our members. In particular, the continued lack of sufficient electrical infrastructure and available ZEVs may impair our ability to respond effectively to emergencies and investor-owned utility service disruptions.

Clean Water SoCal supports the comments submitted by the California Association of Sanitation Agencies (CASA) and other public entities, particularly those addressing impacts on emergency response capabilities.

Accordingly, we respectfully request that the Board direct staff to reopen and revise the ACF regulation to more fully evaluate its impacts and develop a more balanced, comprehensive approach that achieves emission reductions while ensuring the continued reliability of critical essential public services.

If there are any questions regarding this transmittal, please contact me directly at (714) 878-9655 or drothbart@cleanwatersocal.org.

Sincerely,

David L Rothbart

David L. Rothbart, P.E., BCEE
Air Quality Manager – Clean Water SoCal



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