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April 17, 2026

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

*Re: Support for Waste Coalition Comments on the 15-Day Notice of Proposed Changes to the Advanced Clean Fleets Regulation – State and Local Government Fleet Provisions*

Dear Dr. Cliff:

The National Waste & Recycling Association (NWRA) respectfully submits this letter in strong support of the comment letter filed by the Waste Industry Coalition (Coalition) regarding the California Air Resources Board's April 2, 2026, 15-Day Notice of Proposed Changes to the Advanced Clean Fleets (ACF) regulation applicable to State and Local Government (SLG) fleets.

NWRA is the national trade association representing private sector waste and recycling service providers operating in all 50 states. Our members include large, medium, and small companies providing essential waste, recycling and organics services to communities throughout California.

NWRA fully agrees with, and hereby endorses and incorporates by reference, the comments submitted by the Coalition. In particular, we share the Coalition's concerns regarding the need for CARB to clearly confirm that:

1. Privately owned fleets performing services under contract with state or local government agencies are not subject to the SLG Fleet provisions of the ACF regulation; and
2. Vehicles owned or operated by private contractors should not be counted toward a public agency's SLG fleet for ACF compliance purposes.

Absent these clarifications, the proposed regulatory text risk creating substantial legal uncertainty and practical disruption for California's waste and recycling service providers, as well as the public agencies that rely on them to deliver continuous, affordable, and reliable essential services.

NWRA respectfully urges CARB to adopt the clarifications and regulatory changes requested by the Coalition to ensure the ACF regulation remains legally defensible, transparent, and workable in practice. Thank you for considering these comments and for your continued engagement with the waste and recycling industry on implementation of the ACF regulation.

Very truly yours,

A handwritten signature in black ink, appearing to read "Anne M. Germain".

Anne M. Germain  
Chief Technical & Regulatory Affairs