



April 17, 2026

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

Re: Comments on the 15-Day Notice and Proposed Amendments to the Advanced Clean Fleets Regulation State and Local Government Fleets (April 2, 2026)

Dear Dr. Cliff:

The undersigned local governments, private fleet owners, and organizations appreciate the opportunity to submit comments on the Advanced Clean Fleets (“ACF”) regulation during this 15-day comment period.

The proposed amendments and staff’s corresponding explanation of changes in the 15-day notice imply CARB intends to significantly increase the scope of the regulation and, in turn, the scope of local government responsibility. These modifications, if interpreted to include contracted fleets, introduce substantial new requirements affecting both contracted service providers and state and local government entities acting as hiring agencies. The scope, substance, and timing of these changes raise serious procedural and practical concerns.

The proposed revisions and the purported staff interpretation have created material ambiguity regarding how these provisions are intended to operate in practice. If the 15-Day Package intends to fold municipally contracted fleets into state and local government compliance obligations, such a shift effectively converts municipal procurement and service delivery into a vehicle for state enforcement, exposing local governments to increased costs, reduced contractor availability, and diminished flexibility in negotiating long-term service agreements, particularly for essential services like waste hauling, street sweeping, construction, and public works.

These provisions would appear to extend ACF compliance beyond fleet ownership and into third-party contractual relationships—an enforcement structure that was not proposed, evaluated, or described in the original rulemaking materials.

This concern is compounded by CARB's prior repeal of the High Priority Fleet requirements, which had previously applied to many of the same private operators now implicated by the 15-day modifications. The current proposal effectively reintroduces similar compliance obligations through a different regulatory mechanism, without notice or analysis in the originally noticed rulemaking.

Neither governments nor private contractors were provided notice of these fundamental changes prior to this brief comment period. As a result, affected parties were denied a meaningful opportunity to evaluate and comment on these provisions. These 15-Day changes are not technical refinements, and they do not represent the direction provided by the Board at the September 2025 Board meeting. They represent a fundamental restructuring of the ACF regulatory framework, introduced at the final stage of rulemaking.

Given the scope and significance of these changes, the undersigned organizations respectfully request that CARB expressly clarify that contracted fleets are not subject to the current rulemaking.

Thank you for considering our comments.

Sincerely,

Alex Braicovich, Senior Vice President,
Environmental Services, CR&R
Environmental

David Button, South San Francisco
Scavenger

Michael Caprio, Republic Services

Damon Conklin, League of California
Cities

Gene Della Zoppa, Mill Valley Refuse

David Fahrion, California Waste and
Recycling Association

Mark Figone, East Bay Sanitary Co.

Staci Heaton, Rural County
Representatives of California

Joe LaMariana, Executive Director,
RethinkWaste

Mike Lewis, Construction Industry Air
Quality Coalition

Julia Mangin, Recology

Mark Neuburger, California State
Association of Counties

Veronica Pardo, Resource Recovery
Coalition of California

Christy Pestoni, Waste Connections

Kish Rajan, Mt. Diablo Resource Recovery

Alessandra Magnasco, California Fuels
and Convenience Alliance

Chris Valbusa, Alameda County
Industries

Justin Wilcock, Marin Sanitary Service

Christine Wolfe, WM of California