NAFA Fleet Management Association (Michael Taylor)

April 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: NAFA Comments on Implementation Considerations for ACF, LCFS, and Related Amendments

Dear Chair Sanchez and Members of the Board:

On behalf of the NAFA Fleet Management Association (NAFA), we appreciate the opportunity to provide comments on recent developments related to the Advanced Clean Fleets (ACF) regulation, Low Carbon Fuel Standard (LCFS), and associated amendments.

NAFA and its members, including fleets operating across California, strongly support California's leadership in advancing emissions reductions across the transportation sector. As these policies move further into implementation, our comments are intended to provide an operational perspective from the fleets responsible for delivering essential services across the state.

We have framed these comments with a focus on implementation durability, state-local alignment, and maintaining forward momentum in fleet transition.

General Observations
NAFA supports California's goals to reduce emissions from medium- and heavy-duty vehicles and recognizes CARB's leadership in advancing cleaner transportation under its Clean Air Act authority. Our members are actively engaged in fleet modernization and are committed to deploying lower-emission and zero-emission technologies where those technologies can reliably meet operational needs.

The Implementation Challenge Has Shifted
However, the context in which these regulations are being implemented has changed materially. The issue before the Board is no longer one of policy ambition, but of implementation under conditions that are increasingly uncertain—legally, economically, and operationally.

Recent federal developments and ongoing litigation have introduced uncertainty regarding the scope, durability, and enforceability of California's authority to enforce certain vehicle emissions requirements. At the same time, CARB has been required to modify elements of the ACF framework, including provisions that had previously been expected to drive broader market demand. As a result, state and local government fleets are now, in practice, the primary entities responsible for carrying forward compliance obligations, even as the market signals that were expected to support that transition have weakened.

In this context, implementation decisions must remain closely aligned with current legal authority and enforceability to avoid creating obligations that may not be durable over time.

Public Fleets Are Carrying Disproportionate Risk

This shift has real consequences. A county public works fleet attempting to procure medium-duty trucks for road maintenance may find that the configurations required for its duty cycles—vehicles capable of sustained operation across varied terrain with specialized equipment—are not available in zero-emission form within required timelines. A municipal utility fleet responsible for storm response may face a different constraint: vehicles must be capable of operating continuously for extended periods, often in off-grid conditions where charging infrastructure is unavailable or compromised. In rural areas, where distances are longer and infrastructure deployment is slower, these challenges are even more pronounced, particularly in geographically diverse communities where infrastructure timelines, grid capacity, and service distances create additional constraints.

These are representative conditions across fleet operations; they reflect the operational realities facing fleets across the state. In addition, in many cases currently available configurations present materially higher total cost of ownership, creating further challenges for fleets operating under fixed budget and procurement constraints.

Because these responsibilities are carried out by counties, cities, and special districts, implementation of ACF is, in practice, a state-local partnership, and its success depends on alignment between policy expectations and local operational capacity.

In effect, the current structure transfers a significant portion of compliance risk from manufacturers and market actors to public fleet operators, who have limited ability to influence vehicle availability, infrastructure deployment, or regulatory timelines.

Regulatory Stability and Procurement Timing

At the same time, procurement decisions for fleets are governed by multi-year budget cycles, public contracting requirements, and infrastructure planning timelines. It is not uncommon for a fleet to initiate a procurement process 12 to 24 months before vehicles are delivered, with infrastructure deployment—particularly for medium- and heavy-duty charging—requiring similar or longer lead times due to permitting, interconnection, and construction constraints. These conditions underscore the importance of aligning compliance expectations with both operational feasibility and long-term cost performance.

Under these conditions, regulatory instability becomes a primary risk factor. When compliance pathways are evolving, when enforcement authority is subject to federal determination, or when amendments are introduced mid-cycle, fleets are placed in a position where they must make capital decisions without clear assurance that those decisions will remain valid over time. In practice, this can lead to delayed procurement, increased costs, or the selection of suboptimal solutions driven by compliance uncertainty rather than operational suitability.

Just as importantly, it can compromise fleets' ability to deliver essential services. Public works fleets may face delays in maintaining roads and infrastructure if replacement vehicles are unavailable. Utility fleets may encounter constraints in restoring power or responding to outages if vehicles cannot meet operational requirements in off-grid or extended-use conditions. Public safety and emergency response fleets rely on equipment that must perform reliably under all conditions, including during extreme weather events, where current technology and infrastructure limitations remain. These are not hypothetical concerns, but operational risks that must be accounted for in

implementation.

For public fleets in particular, these risks are not borne internally but on behalf of taxpayers. Fleet managers are obligated to ensure that capital investments are reliable, cost-effective, and durable over the full service life of the asset. When regulatory uncertainty, technology availability, or infrastructure readiness introduce elevated risk into procurement decisions, the consequence is not only operational—it is fiscal. Ensuring that compliance pathways align with equipment reliability and long-term cost performance is therefore essential to responsible public stewardship.

Aligning Implementation with Market and Infrastructure Readiness
NAFA's members are not seeking to avoid transition. They are seeking to execute that transition in a manner that is feasible, cost-effective, and consistent with their responsibility to provide essential services and manage long-term capital investments responsibly. The challenge is that current conditions create a widening gap between regulatory timelines and real-world readiness.

Vehicle availability remains constrained in several key segments, particularly for medium- and heavy-duty applications with specialized configurations. Delivery timelines frequently extend beyond 18–24 months for required configurations. At the same time, infrastructure deployment, particularly for high-capacity charging, continues to lag behind vehicle procurement needs. These delays are not within the control of fleet operators, yet they directly affect the ability to comply with regulatory requirements.

Maintaining forward momentum in fleet transition will depend on ensuring that early implementation challenges do not create conditions that slow adoption, delay procurement, or reduce confidence among fleet operators.

Given the scale of fleets represented by NAFA members, these constraints affect not isolated procurements, but system-wide planning decisions across thousands of vehicles and multiple budget cycles. As a result, these constraints have implications not only for compliance, but for the continuity and reliability of essential public services across the state.

Addressing these factors will strengthen the effectiveness of ACF implementation and support CARB's ability to deliver measurable and sustained emissions reductions.

These constraints are not limited to vehicle availability and infrastructure timelines alone, but extend to fuel pathways, compliance structures, and the underlying viability of available technologies.

Technology-Neutral Pathways and Carbon Intensity Considerations
In addition, NAFA encourages continued recognition of a broader set of proven low-carbon fuel pathways as part of a durable transition strategy. Renewable diesel and renewable natural gas (RNG), in particular, are currently deployable at scale across many fleet applications and can provide meaningful—and in some cases substantial—lifecycle emissions reductions depending on feedstock and production pathway. In certain operating conditions, these fuels may offer comparable or greater near-term emissions benefits relative to electrification, particularly where grid carbon intensity, charging timing, or infrastructure constraints affect overall system performance. More broadly, ensuring that compliance pathways reflect technologies that are currently deployable across diverse duty cycles will be critical to maintaining momentum during

this phase of transition.

At the same time, emerging technologies such as hydrogen present longer-term potential but continue to face significant cost and infrastructure barriers that limit near-term applicability for most fleet operations. Recognizing these differences is not a question of prioritizing one technology over another, but of ensuring that compliance pathways reflect real-world performance, cost, and availability.

A technology-neutral, performance-based approach—grounded in verified carbon intensity and operational feasibility—will better support sustained emissions reductions while maintaining service reliability across diverse fleet types.

Shifting Compliance Responsibilities and Contract-Based Implications

Recent proposed modifications to the ACF framework further illustrate the evolving nature of implementation and the importance of maintaining alignment between policy design and operational reality. In particular, changes that extend compliance obligations beyond directly regulated fleets to include contracted service providers introduce a new layer of complexity for public agencies and fleet operators.

Under this structure, compliance is no longer limited to fleet ownership and operation, but increasingly intersects with procurement, contracting, and administrative oversight functions. Public agencies may be required to verify contractor compliance, incorporate regulatory disclosures into contracts, and maintain documentation subject to audit. These requirements, while intended to support enforcement and transparency, effectively shift a portion of compliance responsibility from regulated entities to those managing service delivery relationships.

This shift has practical implications. It may affect contractor availability, increase administrative burden, and introduce new considerations into procurement timelines and cost structures. More broadly, it reinforces the need for implementation frameworks that clearly define roles, responsibilities, and accountability across all parties involved.

As ACF continues to evolve, ensuring that compliance structures remain transparent, administratively feasible, and aligned with existing procurement and service delivery systems will be critical to maintaining both regulatory effectiveness and operational continuity.

Vehicle Availability, Manufacturer Stability, and Functional Equivalence

As CARB continues to assess vehicle availability in determining compliance pathways, it is important that "availability" reflects not only the ability to place an order, but the likelihood that a vehicle can be delivered, supported, and operated reliably over its intended service life.

Recent market developments highlight the importance of this distinction. CARB previously maintained public-facing information identifying a broad set of medium- and heavy-duty zero-emission vehicles described as "available now." That list has materially contracted as several manufacturers have faced financial instability or ceased operations altogether. This shift is not simply a market adjustment—it directly affects fleet confidence in procurement decisions. Vehicles that were once presented as viable compliance options may no longer be deliverable, supportable, or backed by stable manufacturers, increasing the risk associated with long-term capital investment.

For fleets operating under multi-year procurement cycles, this instability is not theoretical, it directly affects service continuity, maintenance support, and total cost of ownership.

In this context, consideration should be given to the characteristics of a viable supplier, including demonstrated production history, vehicles in active operation, and access to parts, service, and warranty support within a reasonable geographic range. These factors are critical to ensuring that procurement decisions are not only compliant at the point of purchase, but sustainable over time. Without such considerations, procurement decisions may meet compliance requirements in the short term while introducing long-term operational and financial risk.

In addition, functional equivalence must be assessed in practical terms. For many medium- and heavy-duty applications, capabilities such as towing, payload configuration, and equipment integration are essential to meeting duty cycle requirements. Vehicles that cannot perform these functions may not represent true replacements, even if they meet classification or weight thresholds. Aligning compliance determinations with real-world performance will be essential to avoiding gaps between regulatory expectations and operational capability.

Operational Reality Across Fleet Types

In this environment, it is essential that implementation mechanisms reflect performance and feasibility rather than rigid timelines alone. A fleet should not be required to procure a vehicle that cannot meet its duty cycle, nor should it be penalized for continuing to operate a vehicle that remains functionally necessary and within its useful life. Similarly, a fleet that has entered into a good-faith procurement contract based on available guidance should have confidence that those decisions will not later be deemed non-compliant due to regulatory changes outside its control.

The Need for Ongoing Fleet Input

NAFA therefore encourages CARB to continue evolving its approach toward one that emphasizes stability, transparency, and performance-based flexibility.

Stability is critical to maintaining procurement momentum. Clear safe-harbor provisions for good-faith decisions, protection of executed contracts, and defined transition periods following regulatory or legal changes would provide fleets with the confidence needed to proceed with investments. Without such assurances, the rational response for many fleets will be to delay decisions, which serves neither emissions goals nor operational needs.

Transparency is equally important. As regulatory complexity increases, fleets require clear, accessible information regarding which vehicle configurations are compliant, how different regulatory pathways interact, and how compliance will be assessed over time. Tools such as standardized manufacturer disclosures, publicly available compliance lists, and accessible verification systems would significantly reduce uncertainty and improve decision-making.

Flexibility must also be grounded in real-world performance. Waiver and exemption processes should be transparent, evidence-based, and responsive to operational conditions, including duty cycle requirements, geographic constraints, and infrastructure availability. These processes should not be viewed as exceptions, but as integral components of an implementation framework that recognizes the diversity of fleet operations across California.

Finally, the current moment underscores the importance of structured, ongoing engagement with

fleet operators. The pace of regulatory change, combined with rapidly evolving market conditions, requires continuous feedback from those responsible for implementation. Counties, cities, special districts, and rural operators each face distinct challenges, and their perspectives are essential to ensuring that policies function as intended across different contexts.

These considerations are consistently reflected across counties, cities, special districts, and rural operators responsible for delivering essential services under diverse operating conditions. These shared conditions create a strong basis for coordinated input from public-sector fleet operators across California.

A structured approach to fleet engagement would build on California's long-standing commitment to inclusive, stakeholder-driven policy development and ensure that implementation reflects the diversity of communities and operating conditions across the state.

While significant input has been provided to date, there remains an opportunity to more fully translate that input into implementation decisions. Strengthening this connection will be critical to ensuring that policies are not only well-informed, but also operationally viable and durable over time.

NAFA believes that a more formalized advisory structure, whether through an ongoing working group or a broader fleet advisory body, would provide CARB with timely, operationally grounded insight while giving fleet operators a clear channel for raising implementation challenges before they become systemic issues. This will be essential to ensuring both the success of ACF implementation and the continued delivery of essential services across California.

Conclusion
NAFA and its members remain committed to California's emissions and air quality goals. The progress made to date is significant, and the direction of travel is clear. The question at this stage is not whether fleets will transition, but whether that transition is structured in a way that distributes risk appropriately across regulators, manufacturers, and operators. With continued collaboration and targeted alignment between policy and operational conditions, California can maintain its leadership while ensuring that fleet modernization remains achievable, resilient, and effective across all communities.

NAFA offers these comments in the spirit of supporting California's continued leadership in climate policy while ensuring that implementation remains durable, equitable, and achievable across all communities. NAFA stands ready to work with CARB and with public-sector partners across the state to support practical, durable implementation.

Respectfully submitted,

Bill Schankel
CEO
NAFA Fleet Management Association

FLEET MANAGEMENT ASSOCIATION

Creating Efficient, Sustainable, Safe Fleets

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

April 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: NAFA Comments on Implementation Considerations for ACF, LCFS, and Related Amendments

Dear Chair Sanchez and Members of the Board:

On behalf of the NAFA Fleet Management Association (NAFA), we appreciate the opportunity to provide comments on recent developments related to the Advanced Clean Fleets (ACF) regulation, Low Carbon Fuel Standard (LCFS), and associated amendments.

NAFA and its members, including fleets operating across California, strongly support California's leadership in advancing emissions reductions across the transportation sector. As these policies move further into implementation, our comments are intended to provide an operational perspective from the fleets responsible for delivering essential services across the state.

We have framed these comments with a focus on implementation durability, state-local alignment, and maintaining forward momentum in fleet transition.

General Observations
NAFA supports California's goals to reduce emissions from medium- and heavy-duty vehicles and recognizes CARB's leadership in advancing cleaner transportation under its Clean Air Act authority. Our members are actively engaged in fleet modernization and are committed to deploying lower-emission and zero-emission technologies where those technologies can reliably meet operational needs.

The Implementation Challenge Has Shifted
However, the context in which these regulations are being implemented has changed materially. The issue before the Board is no longer one of policy ambition, but of implementation under conditions that are increasingly uncertain—legally, economically, and operationally.

Recent federal developments and ongoing litigation have introduced uncertainty regarding the scope, durability, and enforceability of California's authority to enforce certain vehicle

FLEET MANAGEMENT ASSOCIATION

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

emissions requirements. At the same time, CARB has been required to modify elements of the ACF framework, including provisions that had previously been expected to drive broader market demand. As a result, state and local government fleets are now, in practice, the primary entities responsible for carrying forward compliance obligations, even as the market signals that were expected to support that transition have weakened.

In this context, implementation decisions must remain closely aligned with current legal authority and enforceability to avoid creating obligations that may not be durable over time.

Public Fleets Are Carrying Disproportionate Risk

This shift has real consequences. A county public works fleet attempting to procure medium-duty trucks for road maintenance may find that the configurations required for its duty cycles—vehicles capable of sustained operation across varied terrain with specialized equipment—are not available in zero-emission form within required timelines. A municipal utility fleet responsible for storm response may face a different constraint: vehicles must be capable of operating continuously for extended periods, often in off-grid conditions where charging infrastructure is unavailable or compromised. In rural areas, where distances are longer and infrastructure deployment is slower, these challenges are even more pronounced, particularly in geographically diverse communities where infrastructure timelines, grid capacity, and service distances create additional constraints.

These are representative conditions across fleet operations; they reflect the operational realities facing fleets across the state. In addition, in many cases currently available configurations present materially higher total cost of ownership, creating further challenges for fleets operating under fixed budget and procurement constraints.

Because these responsibilities are carried out by counties, cities, and special districts, implementation of ACF is, in practice, a state-local partnership, and its success depends on alignment between policy expectations and local operational capacity.

In effect, the current structure transfers a significant portion of compliance risk from manufacturers and market actors to public fleet operators, who have limited ability to influence vehicle availability, infrastructure deployment, or regulatory timelines.

Regulatory Stability and Procurement Timing

At the same time, procurement decisions for fleets are governed by multi-year budget cycles, public contracting requirements, and infrastructure planning timelines. It is not uncommon for a fleet to initiate a procurement process 12 to 24 months before vehicles are delivered, with

FLEET MANAGEMENT ASSOCIATION

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

infrastructure deployment—particularly for medium- and heavy-duty charging—requiring similar or longer lead times due to permitting, interconnection, and construction constraints. These conditions underscore the importance of aligning compliance expectations with both operational feasibility and long-term cost performance.

Under these conditions, regulatory instability becomes a primary risk factor. When compliance pathways are evolving, when enforcement authority is subject to federal determination, or when amendments are introduced mid-cycle, fleets are placed in a position where they must make capital decisions without clear assurance that those decisions will remain valid over time. In practice, this can lead to delayed procurement, increased costs, or the selection of suboptimal solutions driven by compliance uncertainty rather than operational suitability.

Just as importantly, it can compromise fleets' ability to deliver essential services. Public works fleets may face delays in maintaining roads and infrastructure if replacement vehicles are unavailable. Utility fleets may encounter constraints in restoring power or responding to outages if vehicles cannot meet operational requirements in off-grid or extended-use conditions. Public safety and emergency response fleets rely on equipment that must perform reliably under all conditions, including during extreme weather events, where current technology and infrastructure limitations remain. These are not hypothetical concerns, but operational risks that must be accounted for in implementation.

For public fleets in particular, these risks are not borne internally but on behalf of taxpayers. Fleet managers are obligated to ensure that capital investments are reliable, cost-effective, and durable over the full service life of the asset. When regulatory uncertainty, technology availability, or infrastructure readiness introduce elevated risk into procurement decisions, the consequence is not only operational—it is fiscal. Ensuring that compliance pathways align with equipment reliability and long-term cost performance is therefore essential to responsible public stewardship.

Aligning Implementation with Market and Infrastructure Readiness

NAFA's members are not seeking to avoid transition. They are seeking to execute that transition in a manner that is feasible, cost-effective, and consistent with their responsibility to provide essential services and manage long-term capital investments responsibly. The challenge is that current conditions create a widening gap between regulatory timelines and real-world readiness.

Vehicle availability remains constrained in several key segments, particularly for medium- and heavy-duty applications with specialized configurations. Delivery timelines frequently extend

FLEET MANAGEMENT ASSOCIATION

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

beyond 18–24 months for required configurations. At the same time, infrastructure deployment, particularly for high-capacity charging, continues to lag behind vehicle procurement needs. These delays are not within the control of fleet operators, yet they directly affect the ability to comply with regulatory requirements.

Maintaining forward momentum in fleet transition will depend on ensuring that early implementation challenges do not create conditions that slow adoption, delay procurement, or reduce confidence among fleet operators.

Given the scale of fleets represented by NAFA members, these constraints affect not isolated procurements, but system-wide planning decisions across thousands of vehicles and multiple budget cycles. As a result, these constraints have implications not only for compliance, but for the continuity and reliability of essential public services across the state.

Addressing these factors will strengthen the effectiveness of ACF implementation and support CARB's ability to deliver measurable and sustained emissions reductions.

These constraints are not limited to vehicle availability and infrastructure timelines alone, but extend to fuel pathways, compliance structures, and the underlying viability of available technologies.

Technology-Neutral Pathways and Carbon Intensity Considerations

In addition, NAFA encourages continued recognition of a broader set of proven low-carbon fuel pathways as part of a durable transition strategy. Renewable diesel and renewable natural gas (RNG), in particular, are currently deployable at scale across many fleet applications and can provide meaningful—and in some cases substantial—lifecycle emissions reductions depending on feedstock and production pathway. In certain operating conditions, these fuels may offer comparable or greater near-term emissions benefits relative to electrification, particularly where grid carbon intensity, charging timing, or infrastructure constraints affect overall system performance. More broadly, ensuring that compliance pathways reflect technologies that are currently deployable across diverse duty cycles will be critical to maintaining momentum during this phase of transition.

At the same time, emerging technologies such as hydrogen present longer-term potential but continue to face significant cost and infrastructure barriers that limit near-term applicability for most fleet operations. Recognizing these differences is not a question of prioritizing one technology over another, but of ensuring that compliance pathways reflect real-world performance, cost, and availability.

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

A technology-neutral, performance-based approach—grounded in verified carbon intensity and operational feasibility—will better support sustained emissions reductions while maintaining service reliability across diverse fleet types.

Shifting Compliance Responsibilities and Contract-Based Implications

Recent proposed modifications to the ACF framework further illustrate the evolving nature of implementation and the importance of maintaining alignment between policy design and operational reality. In particular, changes that extend compliance obligations beyond directly regulated fleets to include contracted service providers introduce a new layer of complexity for public agencies and fleet operators.

Under this structure, compliance is no longer limited to fleet ownership and operation, but increasingly intersects with procurement, contracting, and administrative oversight functions. Public agencies may be required to verify contractor compliance, incorporate regulatory disclosures into contracts, and maintain documentation subject to audit. These requirements, while intended to support enforcement and transparency, effectively shift a portion of compliance responsibility from regulated entities to those managing service delivery relationships.

This shift has practical implications. It may affect contractor availability, increase administrative burden, and introduce new considerations into procurement timelines and cost structures. More broadly, it reinforces the need for implementation frameworks that clearly define roles, responsibilities, and accountability across all parties involved.

As ACF continues to evolve, ensuring that compliance structures remain transparent, administratively feasible, and aligned with existing procurement and service delivery systems will be critical to maintaining both regulatory effectiveness and operational continuity.

Vehicle Availability, Manufacturer Stability, and Functional Equivalence

As CARB continues to assess vehicle availability in determining compliance pathways, it is important that “availability” reflects not only the ability to place an order, but the likelihood that a vehicle can be delivered, supported, and operated reliably over its intended service life.

Recent market developments highlight the importance of this distinction. CARB previously maintained public-facing information identifying a broad set of medium- and heavy-duty zero-emission vehicles described as “available now.” That list has materially contracted as several manufacturers have faced financial instability or ceased operations altogether. This shift is not

FLEET MANAGEMENT ASSOCIATION

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

simply a market adjustment—it directly affects fleet confidence in procurement decisions. Vehicles that were once presented as viable compliance options may no longer be deliverable, supportable, or backed by stable manufacturers, increasing the risk associated with long-term capital investment.

For fleets operating under multi-year procurement cycles, this instability is not theoretical, it directly affects service continuity, maintenance support, and total cost of ownership.

In this context, consideration should be given to the characteristics of a viable supplier, including demonstrated production history, vehicles in active operation, and access to parts, service, and warranty support within a reasonable geographic range. These factors are critical to ensuring that procurement decisions are not only compliant at the point of purchase, but sustainable over time. Without such considerations, procurement decisions may meet compliance requirements in the short term while introducing long-term operational and financial risk.

In addition, functional equivalence must be assessed in practical terms. For many medium- and heavy-duty applications, capabilities such as towing, payload configuration, and equipment integration are essential to meeting duty cycle requirements. Vehicles that cannot perform these functions may not represent true replacements, even if they meet classification or weight thresholds. Aligning compliance determinations with real-world performance will be essential to avoiding gaps between regulatory expectations and operational capability.

Operational Reality Across Fleet Types

In this environment, it is essential that implementation mechanisms reflect performance and feasibility rather than rigid timelines alone. A fleet should not be required to procure a vehicle that cannot meet its duty cycle, nor should it be penalized for continuing to operate a vehicle that remains functionally necessary and within its useful life. Similarly, a fleet that has entered into a good-faith procurement contract based on available guidance should have confidence that those decisions will not later be deemed non-compliant due to regulatory changes outside its control.

The Need for Ongoing Fleet Input

NAFA therefore encourages CARB to continue evolving its approach toward one that emphasizes stability, transparency, and performance-based flexibility.

Stability is critical to maintaining procurement momentum. Clear safe-harbor provisions for good-faith decisions, protection of executed contracts, and defined transition periods following

FLEET MANAGEMENT ASSOCIATION

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

regulatory or legal changes would provide fleets with the confidence needed to proceed with investments. Without such assurances, the rational response for many fleets will be to delay decisions, which serves neither emissions goals nor operational needs.

Transparency is equally important. As regulatory complexity increases, fleets require clear, accessible information regarding which vehicle configurations are compliant, how different regulatory pathways interact, and how compliance will be assessed over time. Tools such as standardized manufacturer disclosures, publicly available compliance lists, and accessible verification systems would significantly reduce uncertainty and improve decision-making.

Flexibility must also be grounded in real-world performance. Waiver and exemption processes should be transparent, evidence-based, and responsive to operational conditions, including duty cycle requirements, geographic constraints, and infrastructure availability. These processes should not be viewed as exceptions, but as integral components of an implementation framework that recognizes the diversity of fleet operations across California.

Finally, the current moment underscores the importance of structured, ongoing engagement with fleet operators. The pace of regulatory change, combined with rapidly evolving market conditions, requires continuous feedback from those responsible for implementation. Counties, cities, special districts, and rural operators each face distinct challenges, and their perspectives are essential to ensuring that policies function as intended across different contexts.

These considerations are consistently reflected across counties, cities, special districts, and rural operators responsible for delivering essential services under diverse operating conditions. These shared conditions create a strong basis for coordinated input from public-sector fleet operators across California.

A structured approach to fleet engagement would build on California's long-standing commitment to inclusive, stakeholder-driven policy development and ensure that implementation reflects the diversity of communities and operating conditions across the state.

While significant input has been provided to date, there remains an opportunity to more fully translate that input into implementation decisions. Strengthening this connection will be critical to ensuring that policies are not only well-informed, but also operationally viable and durable over time.

NAFA believes that a more formalized advisory structure, whether through an ongoing working group or a broader fleet advisory body, would provide CARB with timely, operationally

GENERAL CORRESPONDENCE
180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS
P.O. Box 412963
Boston, MA 02241-2963

609-720-0882
info@nafa.org

grounded insight while giving fleet operators a clear channel for raising implementation challenges before they become systemic issues. This will be essential to ensuring both the success of ACF implementation and the continued delivery of essential services across California.

Conclusion

NAFA and its members remain committed to California's emissions and air quality goals. The progress made to date is significant, and the direction of travel is clear. The question at this stage is not whether fleets will transition, but whether that transition is structured in a way that distributes risk appropriately across regulators, manufacturers, and operators. With continued collaboration and targeted alignment between policy and operational conditions, California can maintain its leadership while ensuring that fleet modernization remains achievable, resilient, and effective across all communities.

NAFA offers these comments in the spirit of supporting California's continued leadership in climate policy while ensuring that implementation remains durable, equitable, and achievable across all communities. NAFA stands ready to work with CARB and with public-sector partners across the state to support practical, durable implementation.

Respectfully submitted,

Bill Schankel
CEO
NAFA Fleet Management Association