



WASTE CONNECTIONS
Connect with the Future®

April 17, 2026

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

VIA ELECTRONIC SUBMITTAL <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Ref: Comments on Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations, Public Access Date, April 2, 2026

Dear Clerk of the Board:

Waste Connections of California, Inc. and a number of its affiliated entities (collectively, "Waste Connections"), provide solid waste collection and recycling services to communities throughout California under contract with local government agencies. We share the State's interest in improving air quality and reducing greenhouse gas emissions across California. We have invested heavily in environmental controls, alternative fuels, organics diversion, and emissions-reduction strategies, and we take seriously our responsibility as a steward of the environment in the communities we serve. We have consistently supported well-designed climate policies that deliver measurable benefits while preserving the reliability and affordability of essential waste and recycling services.

We are providing the following comments on the proposed amendments to the State and Local Government (SLG) part of the Advanced Clean Fleets (ACF) Regulation.

- 1) Notice: We received no notice or opportunity to discuss the matter of the new "waste fleet" prior to the April 2, 2026 document. Our Government Affairs and consultant team has been closely watching the ACF over many years. There has been no effort from CARB that we are aware of to engage us or our multiple association partners in discussions of this groundbreaking change to how we do business in the communities we serve. On these grounds alone, the current proposal should not be finalized until the financial and contractual impacts and feasibility of the proposal is completely understood and our ability to continue to serve millions of Californians with high quality and cost-effective waste services is not disrupted.
- 2) Implementation: Waste Connections is deeply concerned about the lack of specificity in the present document on implementation of the proposed requirements with our local government customers under existing agreements. For example, should the SLG proposal to make "waste fleets" the responsibility of our municipal customers it is unclear what impacts of the timing and the known high upfront costs of ZEVs would have on the

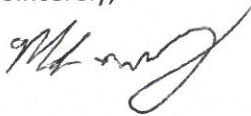


ratepayers, even if there were certainty that ZEVs and ZEV infrastructure could meet the customers' needs over time.

- 3) ZEV Experience to date: We speak from experience that ZEVs cannot currently meet our service requirements across our California fleet footprint. We, like others in our industry, have purchased and implemented ZEV waste collection trucks in limited markets and they do not meet our current needs in terms of performance and cost. Furthermore, the collapse in the OEM market for ZEVs from our traditional suppliers like Ford and GM is troubling. There are very few options for a ZEV garbage truck today and we are not seeing our suppliers making a commitment to us that they will ever be able to manufacture and sell us a vehicle that performs anywhere close to our current renewable natural gas or clean diesel fleet.
- 4) Affordability: As our operating companies and industry have invested heavily in organics diversion programs as required by Senate Bill 1383 we are intimately aware of the local rate impacts that have taken many years of negotiations with our municipal customers. Like others in our industry we have seen rate increases in the 25% to 75% range at the customer level. While we support SB 1383's goals to reduce short lived climate pollutants in our communities it comes at a significant cost for much of our customer base. With affordability on the minds of all Californians we see no critical analysis in the ACF documents to discuss the financial impacts, other than the startling conclusion under the Total Cost of Ownership calculations that ZEVs will result in our lower operating costs over time. That is not our experience with the battery electric vehicles that we have operated for over four years and CARB has an obligation to disclose the economic impacts of your regulatory proposals. What you have supplied is not adequate and is another reason this proposal should be abandoned.
- 5) Legal Authority and Federal Preemption: We believe that CARB's determination that it does not need a federal Clean Air Act waiver is not correct. Furthermore, we believe that expanding the scope of the SLG to include privately-owned fleets like ours requires a Clean Air Act waiver of preemption from the United States Environmental Protection Agency.

In conclusion, we urge CARB to abandon the current SLG amendments. If you wish dialogue with the waste industry on clean truck strategies, our team is available for meaningful dialogue immediately. I may be reached at mark.gingrich@wasteconnections.com.

Sincerely,



Mark Gingrich
Division Vice President

