



June 16, 2026

Dr. Steven Cliff
Executive Officer
California Air Resources Board
Submitted electronically via <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

RE: Comments on June 1, 2026 15-Day Notice of Proposed Changes to the Advanced Clean Fleets Regulation

Dear Dr. Cliff,

Thank you for the opportunity to comment on the 15-day Changes to the Proposed Regulation Order – Advanced Clean Fleets Regulation, issued on June 1, 2026. I am writing on behalf of Recology, one of the leading recycling, composting, and waste collection companies in the state.

Recology and its over 30 California subsidiaries operate a fleet of over 2,000 vehicles in the state. We service over 85 communities throughout Northern California, ranging from major cities and suburban communities to remote rural areas. We trace our roots back more than 100 years. Consistent with our mission, Recology has been piloting ZEV technology since 2019 and is working with manufacturers in testing and developing ZEVs that meet the needs of our industry.

We have reviewed the proposed amended text and disagree with CARB's statement in the 15-day notice that the new language is intended to "make explicit" an existing requirement that vehicles operated through contractual arrangements are part of a state and local government agency's fleet for purposes of ACF compliance. Recology respectfully **requests that the regulation be revised to remove the inclusion of "contracted vehicles" in the definition of "Fleet" and that CARB withdraw its position that contracted vehicles are included in a State and Local Government Agency's fleet for purposes of determining compliance with ACF.**

The above-referenced modifications in the 15-day notice are a substantive expansion that are not sufficiently related to the proposed regulations included in the 45-day notice and are therefore impermissible under the Administrative Procedure Act. A 15-day comment period may only be used for changes that are "sufficiently related" to the original 45-day proposal, such that "the public was adequately placed on notice that the change could result from the originally proposed regulatory action." Cal. Gov. Code § 11346.8(c).

This is clear from the Initial Statement of Reasons ("ISOR") dated August 1, 2025 which expressly stated private fleets were not subject to the State and Local Government Regulations. Recology and similarly situated companies have made business decisions over the past year in reliance of CARB's explicit prior guidance and the record fails to consider the significant impact that this substantial expansion of the regulatory scope will have on all Californians, who rely on private entities to provide reliable, cost-effective waste collection services.

The modifications are also inconsistent with CARB's [Resolution 25-9](#), where CARB repealed the Drayage, and High Priority and Federal Fleet requirements and stated doing so "provides

certainty” to private entities “that they do not need to demonstrate compliance”. While we appreciate CARB’s recent guidance that private fleets are not directly subject to the ACF regulations, inclusion of contracted vehicles in government fleets effectively requires compliance by private solid waste collection companies whose services are performed pursuant to long-term franchise agreements with local governments. The proposed interpretation would require material changes to existing agreements, procurement timelines, and capital planning cycles. This is a fundamental shift in the regulatory framework impermissibly introduced at the final stage of rulemaking and contrary to previous direction from CARB.

We believe a transition to zero emission vehicles is best served through fair, workable regulation that thoughtfully engages with the challenges industries face in transforming their fleets and making the necessary investments. Should CARB desire to move forward with its proposal to include contracted vehicles in SLG Fleets then there should be a more meaningful opportunity to provide comment and hold a public hearing.

Thank you for considering these comments. If you have any questions, please do not hesitate to contact me at jmangin@recology.com.

Respectfully,

A handwritten signature in black ink that reads "Julia Mangin". The script is cursive and fluid, with the first name "Julia" and last name "Mangin" clearly distinguishable.

Julia Mangin
Director, Sustainability & Government Affairs
Recology