



June 16, 2026

Lauren Sanchez, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via electronic submission:

RE: Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations, Second 15-day Changes Posted June 1, 2026

Dear Chair Sanchez and Members of the California Air Resources Board:

The American Lung Association writes to comment in support of the second 15-day changes to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations. The Advanced Clean Fleets (ACF) was developed and designed to clean up emissions in the transportation sector that lead to poor air quality and their attendant health impacts. ACF provides a stable pathway for zero-emission vehicle adoption over time as a key element of California's ongoing commitment to clean air for all.

ACF remains an important healthy air tool to protect Californians. The American Lung Association's "State of the Air" 2026 report shows that despite strong progress, more than eight in 10 Californians (82%), including seven million children, still live in counties with unhealthy levels of ozone and/or particle pollution. Despite representing less than 10% of the total vehicles on California roads, heavy-duty trucks generate the lion's share of these pollutants, which can cause asthma, heart attacks and stroke, developmental harm, lung cancer, and even premature death. These are costly and disruptive health emergencies that strain family budgets across our state.

We appreciate CARB's dedication to ensuring that ACF fleet provisions are implemented successfully. We support the current amendments, which clarify that vehicles contracted by state and local agencies are indeed covered by the Public Fleets section of ACF. This loophole would have created a perverse incentive for public agencies to outsource fleet services to avoid compliance with ACF and thereby reduce opportunities for air quality improvements central to the program.

We recognize the importance of CARB's intent to work with agencies during the initial implementation cycles to ensure long-term compliance. By working together, CARB can maximize the impact and success of the regulation.



Thank you for this opportunity to submit these comments. We urge CARB to adopt the amendments and we hope to continue to be a resource in the mission for clean air. Please contact me with any questions at Benjamin.Lu@Lung.org.

Sincerely,

Benjamin Lu
Advocacy Manager for Clean Air Policy