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June 16, 2026

Submitted electronically via <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Second 15-Day Amendments to the Advanced Clean Fleets Regulation

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

The Sacramento Area Sewer District (SacSewer) appreciates the opportunity to comment on the California Air Resources Board's (CARB's) most recent proposed amendments to the Advanced Clean Fleets (ACF) Regulation released June 1, 2026 (second 15-Day Changes). We respectfully request that **CARB delay approval of the regulations and the second 15-Day Changes** until the requisite evaluations are complete and critical issues are addressed through appropriate amendments. SacSewer is aligned with and supports the comments provided by the California Association of Sanitation Agencies and California Special Districts Association.

SacSewer is the Sacramento region's sewage collection, treatment, and resource recovery utility—providing service to more than 1.6 million people. As such, we maintain critical wastewater infrastructure and are committed to protecting public health, safeguarding the environment, and wisely managing ratepayer dollars. We are committed to necessary processes that allow for public input.

Background

SacSewer prioritized participating in the ACF regulatory development process since Governor Newsom signed [Executive Order N-79-20](#) in 2020. Throughout that process, the CARB Board directed staff to increase flexibility for public agencies, including a specific directive as a condition of their approval of the ACF amendments on September 25, 2025. Unfortunately, the latest amendments do not resolve any of the issues identified to date.

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SacSewer's concerns are focused on three areas

CARB's Change in Policy Substantively Alters Compliance Requirements for Essential Public Services: CARB's change in policy to include contracted vehicles and vehicles performing contracted services in a public agency's fleet inventory (and related compliance obligations) substantively alters how compliance is determined, implemented, and enforced.

Failure to follow the Administrative Procedure Act (APA): CARB's failure to follow rulemaking procedures established by the APA when incorporating a substantive policy change erodes stakeholder trust and may result in the ACF regulation being considered an underground regulation.

Unimplementable regulation and need to increase stakeholder engagement: Without engaging all affected stakeholders in a transparent and public review process with a clear understanding of the substantive policy change, the changes have resulted in an unimplementable regulation.

Conclusion

SacSewer respectfully requests that CARB delay approval of the regulations and the second 15-Day Changes until the requisite evaluations are complete and critical issues are addressed through the APA process and appropriate amendments. Adherence to the APA is essential to making the ACF regulation workable and to prevent avoidable critical infrastructure failures.

Thank you for your time and consideration of our comments. Please contact Jofil Borja, Environmental Legislative and Regulatory Affairs Manager, at borjaj@sacsewer.com for any additional information regarding our position on this important issue.

Sincerely,

Signed by:


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Mike Huot

Director of Policy and Planning
Sacramento Area Sewer District

cc: The Honorable Lauren Sanchez, Chair, CARB
Members, CARB
The Honorable Yana Garcia, Secretary, California Environmental Protection Agency
Adam Link, Executive Director, California Association of Sanitation Agencies
Neil McCormick, Chief Executive Officer, California Special Districts Association