



Miller Industries, Inc.

8503 Hilltop Drive
Ooltewah, Tennessee 37363
Phone (423) 238-4171

June 16, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the Advanced Clean Fleets Regulations

Dear Chair Sánchez and Members of the Board,

I am writing on behalf of Miller Industries, Inc. to formally highlight a critical, unintended operational challenge posed by the Advanced Clean Fleets (ACF) regulation regarding the Freeway Service Patrol (FSP) and those under contract with the California Highway Patrol for roadside assistance, tow and recovery work. While we are committed to California's long-term climate goals, the current lack of commercially viable, zero-emission medium- and heavy-duty recovery vehicles threatens to cripple a program that actively reduces statewide emissions and ensures public safety.

Unfortunately, the revised 15-day amendments create additional confusion for those contractors under the FSP and those with CHP contracts. We encourage CARB to provide an exemption for the FSP program to ensure the program can continue to operate and support motorists in California.

The Technological Impossibility for FSP and CHP Operations

Currently, there are no commercially available zero-emission tow or recovery trucks on the market that meet the rigorous state standards enforced by the California Highway Patrol (CHP). Tow and recovery operators require medium- and heavy-duty vehicles capable of continuous, demanding duty cycles, rapid response, and heavy extractions under extreme conditions. Forcing FSP and CHP contractors to transition to zero-emission vehicles before the manufacturing sector can deliver CHP-compliant, high-capacity electric or hydrogen tow trucks will result in severe fleet shortages and a functional collapse of the service.

Immense Value to California Consumers

The FSP is one of the most successful and cost-effective traffic management programs in the nation. It provides a vital safety net for millions of California motorists daily. Not only does the FSP offer free, rapid roadside assistance to stranded motorists, FSP and CHP contractors also perform critical tow and recovery operations, including recovering disabled vehicles from travel

lanes, uprighting overturned trucks, and removing heavy debris from active roadways. These operations require medium- and heavy-duty equipment for which no zero-emission alternative exists and are essential to keeping the state's economic corridors moving and to protecting California motorists from hazardous freeway conditions.

Preventing Secondary and “Follow-Along” Accidents

The primary safety benefit of the FSP and CHP contractors is the *rapid* clearance of highway anomalies. Statistically, the risk of a secondary, “follow-along” accident increases exponentially for every minute a stalled vehicle or minor incident remains on the highway or shoulder. By clearing hazards within minutes of occurrence, tow and recovery contractors drastically reduce these high-severity secondary collisions, saving civilian lives and protecting first responders who are frequently struck in the line of duty.

Net Positive Environmental Impacts

Ironically, a premature forced mandate on FSP and CHP contractors will increase overall transportation emissions. FSP operations are well documented by U.C. Berkeley as a net-positive environmental program:

- **Congestion Relief:** Millions of hours of vehicle delay are eliminated annually.
- **Stop-and-Go Reduction:** Rapidly clearing bottlenecks prevents massive traffic gridlock.
- **Idling Mitigation:** Reducing stop-and-go traffic drastically lowers baseline greenhouse gas and particulate matter emissions from the general motoring public.

Forcing FSP and CHP contractor trucks off the road due to an unachievable zero-emission mandate will cause freeway congestion to spike, ultimately increasing net emissions across California's highway system.

Requested Action

We urgently request that the California Air Resources Board grant a formal, dedicated exemption for emergency roadside assistance and FSP and CHP contracted recovery vehicles under the ACF rule. This exemption should remain in place until the Executive Officer verifies that zero-emission recovery trucks meeting all CHP safety and operational specifications are widely available in the commercial marketplace.

Thank you for your time, consideration, and continued dedication to balancing California's environmental targets with public safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'VTiano', written over a horizontal line.

Vince Tiano
Vice President and Chief Revenue Officer

