

June 16, 2026

Clerk of the Board and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via electronic submittal

Re: CARB Should Adopt the Proposed Second 15-Day Changes to the Advanced Clean Fleets Regulation

Chair Sanchez and Members of the California Air Resources Board:

Thank you for the opportunity to comment on the California Air Resources Board's (CARB) proposed 15-day changes to the State and Local Government Agency Fleet (Public Fleets) Requirements of the Advanced Clean Fleets (ACF) regulation. The undersigned organizations write in strong support of CARB's second 15-day modifications to the ACF regulation. Our organizations have long championed the ACF regulation as a critical tool for reducing harmful diesel emissions, protecting frontline communities, and accelerating California's transition to a zero-emission future. In addition, these regulations provide a measured pathway towards electric vehicle adoption over time and away from the price volatility of gasoline and diesel vehicles, thereby reducing operating costs.

The importance of the ACF cannot be overstated. According to the American Lung Association's latest 2026 *State of the Air* report, more than eight in 10 Californians (82%) still live in counties plagued by unhealthy air. Los Angeles, Long Beach, and Bakersfield continue to rank as the nation's most polluted for ozone and annual particle pollution. Millions of our most vulnerable residents, including seven million children across the state, are breathing dangerous levels of air pollution that trigger asthma attacks and exacerbate chronic health conditions. Given the scale of the public health crisis, California's state and local agencies must lead by example in deploying zero-emission vehicles (ZEVs) and cleaning up the public fleets that operate daily within our communities.

We appreciate CARB's continued commitment to refining this regulation to ensure maximum efficacy, clarity, and successful implementation. We offer the following comments on the specific modifications detailed in the June 1, 2026 notice:

Clarifying Scope and Closing Ambiguities for Contracted Fleets

We strongly support the proposed modifications to Section 2013, clarifying that vehicles rented, leased, or operated through a contractual agreement are covered by the Public Fleets portion of the ACF regulation. It has always been our understanding that contracted entities are subject to ACF's state and local agency fleet provisions.

The additions made to the "Fleet" definition, "Fleet owner" definition, and operator documentation requirements are critical. These additions remove any purported ambiguity raised by stakeholders and prevent loopholes where public services could be outsourced to private entities simply to evade compliance obligations under the ACF. This misunderstanding could encourage outsourcing of services to circumvent good public policy. Ensuring that public services—whether executed directly by agency staff or third-party contracts—remain committed to ZEV deployment aligns with the core intent of the regulation.

Importantly, we recognize that this clear scope is paired with considerable flexibility for public agencies. State and local government entities maintain significant autonomy in deciding how to obtain ZEVs to remain compliant—whether through vehicles they own, rent, lease, contract, or a combination thereof. For instance, agencies can strategically subdivide their fleets into different compliance pathways, such as placing contracted vehicles on the ZEV Milestone Option pathway while keeping directly owned vehicles on the ZEV Purchase Schedule pathway. Public agencies also have full access to exemptions and extensions of vehicles in their fleets to ensure ACF is achievable and resilient. CARB has established a practical framework and demonstrated a clear readiness to partner with public entities, ensuring a successful, logistically viable transition to zero-emission technologies.

Finally, as noted in a previous comment letter submitted on April 17, 2026, CARB maintains a sound legal basis for ACF's Public Fleets requirements applying to state and local government contracts with private entities.

Support for Compliance Assistance, Education, and Outreach

Our organizations support CARB's approach to begin enforcement efforts by supporting agencies that are making a good faith effort to comply. We recognize that public agencies often face unique institutional and procurement constraints. Focusing initial reporting cycles on compliance assistance, education, and the evaluation of existing flexibility provisions will build a strong foundation for long-term compliance.

Furthermore, we support CARB's intent to work with agencies on a case-by-case basis during these initial implementation cycles to assess ACF's real-world results. Gathering these vital "lessons learned" will provide CARB with the data necessary to evaluate future regulatory modifications and support agencies in their long-term planning. By prioritizing collaboration, CARB is establishing an equitable rollout that ensures public entities are set up for operational success.

A Clear Pathway Forward for Public Health and Compliance

The Second 15-Day modifications successfully standardize terminology, preserve the core integrity of the ACF, and provide the regulatory certainty needed for robust implementation. We urge CARB to swiftly finalize these amendments to maintain momentum toward California's public health and climate goals.

Thank you for the opportunity to submit these comments. Please do not hesitate to reach out to us to discuss this further.

Sincerely,

Guillermo Ortiz
NRDC

Bill Magavern
Coalition for Clean Air

Sam Wilson
Union of Concerned Scientists

Yasmine Agelidis
Candice Youngblood
Earthjustice

Tom Callahan
Environmental Defense Fund