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June 16, 2026

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

Submitted electronically via: <https://carb.commentinput.com/comment/landingPage?lang=en>

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

The Vallejo Flood and Wastewater District (District) appreciates the opportunity to comment on the California Air Resources Board's (CARB's) latest proposed amendments to the Advanced Clean Fleets (ACF) Regulation, issued on June 1, 2026 (the second 15-Day Changes). The District manages wastewater and stormwater for more than 121,000 Vallejo residents, safeguarding public health and the environment. As an economically disadvantaged community, Vallejo relies on careful management of ratepayer funds to ensure value. If approved as-is, the second 15-Day Changes could create implementation challenges for the District.

Opportunities for stakeholder comments on developing regulations are integral to the process. While the District appreciates the opportunity to submit comments, the second 15-Day Changes appear to warrant additional input from wastewater agencies on the availability of compliant vehicles and charging infrastructure, consistent with established rulemaking procedures. CARB's variance from established rulemaking raises concerns about underground regulation. The approval of the second 15-Day Changes should be delayed until a more comprehensive analysis of the impacts on wastewater agencies, such as the District, is completed.

CARB's second 15-Day Changes now include contracted vehicles and those performing contracted services in a public agency's fleet inventory, along with related compliance duties. The definition of Fleet Owner has been expanded to cover any person or entity that owns, rents, leases, or operates vehicles, including those that contract with the District, which likely includes all private fleets engaged in contracted work. It's also unclear whether this responsibility applies to construction firms subcontracting to companies that provide vehicles supporting construction activities. This ambiguity will directly impact the District, as it plans major upgrades to its treatment plant to meet new regulations. Additionally, it could result in the District enforcing ACF standards on private fleets on behalf of CARB, adding further burdens.

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Thank you for your consideration of these comments. Please contact me at jharrington@vallejowastewater.org if you have any questions.

Sincerely,

Jennifer Harrington
Director of Regulatory Affairs

JAH

Cc: Regulatory Affairs