



December 6, 2024

Submitted via [portal](#)

Subject: Proposed Amendments to the Advanced Clean Trucks Regulation

Dear Chair Randolph and Board Members,

The Resource Recovery Coalition of California (RRCC) appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Truck (ACT) regulation. RRCC represents 32 waste management companies that deliver essential waste collection and waste processing services across California. Heavy-duty truck acquisition is a critical concern for our members, as it is essential to meeting contractual obligations and efficiently collecting solid waste to protect the health and safety of local communities.

We support the recent amendment to exclude Omnibus-compliant heavy heavy-duty engines from generating deficits under the ACT for the 2026 model year. We respectfully request that this amendment be extended to also include the 2025 model year. Expanding this exemption will help encourage the purchase of cleaner internal combustion engine trucks that are readily available today.

Although not part of this rulemaking, we also recommend that the Advanced Clean Fleets (ACF) regulation be updated to reflect this amendment. We have consistently advocated for the ability to purchase the cleanest technology available today, particularly given the ongoing constraints in the availability of zero-emission vehicles and viable infrastructure.

We appreciate your consideration of our comments. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Veronica Pardo". The signature is written in a cursive, flowing style.

Veronica Pardo
RRCC Executive Director
veronica@resourcecoalition.org