



January 26, 2026

Dr. Steven Cliff  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Requested Action to Address Regulatory Uncertainty and Advance Near-Term Emission Reductions**

Dear Dr. Cliff:

Thank you for joining the Problem Solvers Caucus at our December 2025 Policy Summit and for your thoughtful engagement on critical issues under CARB's jurisdiction. We greatly appreciate your time and insights on matters of utmost importance to our members.

As we discussed, reducing California's dependence on diesel in a pragmatic, cost-effective, and technologically-feasible manner remains a top priority for this caucus. We are deeply concerned that limitations in the current regulatory structure, particularly the unresolved status of CARB's heavy-duty zero-emission truck (ZET) strategy, are generating significant market uncertainty, causing widespread frustration within the industry, and impeding fleets' ability to invest in newer, cleaner technologies.

Reporting, such as the April 3, 2025 *Trucks, Parts, and Service* [article](#), indicates this trend is driven by economic factors, market conditions, and regulatory uncertainty. While the first two challenges might be too complex for either of us to tackle at this time, the third—clarifying regulatory status—seems well within CARB's ability to address promptly.

Even if California cannot proceed with its transportation decarbonization plan as originally envisioned, we must remain a national leader in reducing toxic emissions by finding practical, readily available solutions to maintain forward progress. CARB's own data underscores this urgency.

CARB's October 2025 State Implementation Plan update projects that today's pause in California's zero-emission strategy could increase NOx emissions by 175 tons per day by 2037. Additionally, the California Transportation Commission has warned that failure to meet federal attainment goals could jeopardize \$75 billion in transportation funding.

These figures alone demand immediate action to mitigate near-term emission increases.

One promising pathway to accomplish this is the near-term deployment of advanced clean combustion technologies that meet CARB's original 50 mg NO<sub>x</sub> Heavy-Duty Low NO<sub>x</sub> Omnibus (Omnibus) standard. These advanced engines are commercially available today and when paired with renewable fuels can deliver significant near-term reductions in criteria pollutants and greenhouse gases in the absence of full electrification when adopted at scale.

Immediately deploying these technologies would allow California to capture meaningful air quality benefits now, rather than waiting for the longer-term ZEV transition. Unfortunately, many fleets are hesitant to invest in these cleaner options due to regulatory uncertainty and concerns about how such purchases will be treated under future mobile source regulations; a fear reinforced by prior CARB actions and statements. A clear example of this is in CARB's [Advanced Clean Fleets \(ACF\) Enforcement Notice](#) from December 2023 (updated in October 2024), threatening retroactive penalties against fleets that purchase non-compliant trucks while federal waiver approvals were pending.<sup>1</sup> A similar statement was also included in the August 2025 [Manufacturers Advisory Correspondence \(MAC\) ECCD-2025-08](#).<sup>2</sup>

Fleet operators have made significant capital investments in these trucks, and no operator will commit to that level of expenditure for cleaner alternatives without clear assurances about the long-term viability of their purchase, affecting both affordability and total cost of ownership. At the same time, California's ability to stay on track in reducing harmful criteria pollutants such as NO<sub>x</sub> and particulate matter (PM<sub>2.5</sub>) depends on persuading fleets to adopt cleaner combustion trucks, an approach that is consistent with CARB staff's stated position during the Drive Forward: Heavy-Duty Vehicle Standards workshop on December 3, 2025.

To that end, the Problem Solvers Caucus respectfully urges CARB to take immediate action to resolve the uncertainty that is currently discouraging fleets from near-term purchases of cleaner combustion trucks. Specifically, we request that CARB, within 30 days of receiving this letter, issue and prominently post on CARB's website a clear statement affirming its commitment to uphold without exception the "useful life" provision in Health and Safety Code §43021 (SB 1-2017) for clean combustion trucks—defined as those equipped with engines that can achieve 50 mg NO<sub>x</sub> or lower—purchased between 2026 and at least 2030 - in future mobile source regulations. A response from CARB is requested.

---

<sup>1</sup> The notice states in relevant part, "CARB encourages fleets to voluntarily report and comply while the waiver request is pending and reserves all of its rights to enforce the ACF regulation in full for any period for which a waiver is granted or for which a waiver is determined to be unnecessary, including (but not limited to) the right to remove non-compliant vehicles added to fleets while the waiver request is pending."

<sup>2</sup> The MAC states, "Manufacturers who seek certification through the alternative pathways (1) and (2) above will therefore be able to continue to offer to sell and deliver new vehicles and engines in the state in the near term while litigation is pending. Manufacturers choosing these pathways should be advised, however, that CARB reserves its right to enforce the regulations covered by the waivers targeted by the congressional resolutions in the event a court of law holds those resolutions invalid, including with respect to model years that such manufacturers ask CARB to certify under these alternative pathways. Whether CARB opts to pursue such enforcement would be decided if and when that question becomes ripe."

We know that it is always CARB's intent to follow the statutory provisions directed by this Legislature, including the "useful life" provision outlined in SB 1 (2017). However, as identified above, recent actions have raised doubts among fleets about whether these protections are absolute. A definitive public statement would provide clarity and assurance, accelerating the near-term adoption of advanced combustion technologies and helping California avoid the environmental and economic consequences of delayed fleet turnover.

We appreciate CARB's leadership and look forward to collaborating on these and other practical solutions that advance California's air quality and climate goals. The caucus stands ready to work collaboratively with CARB to ensure that our state continues to lead the nation in reducing harmful emissions while supporting a strong and sustainable economy.

Thank you for your attention to this critical matter. We look forward to your response. For additional information, please contact David Monroy at [david.monroy@asm.ca.gov](mailto:david.monroy@asm.ca.gov).

Sincerely,



Assembly Member David Alvarez



Assembly Member Juan Alanis



Assembly Member Anamarie Avila Farias



Senator Suzette Martinez Valladares