



CITY OF GLENDALE, CALIFORNIA

Public Works
Administration

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June 12, 2026

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

RE: Advanced Clean Fleets Second 15-Day Comment Period Response

Chair Sanchez and Members of the California Air Resources Board (CARB):

The City of Glendale Public Works Department appreciates CARB's ongoing efforts to improve air quality throughout California and, in particular, the South Coast Air Basin. We also appreciate CARB's willingness to refine and improve the Advanced Clean Fleets (ACF) Regulation through stakeholder engagement and the public comment process.

The City of Glendale is a full-service municipality serving approximately 200,000 residents. The Public Works Department is responsible for delivering a wide range of essential public services through a combination of City personnel and contracted service providers. Since the implementation of ACF, Glendale has diligently reported its city-owned vehicles and equipment through the Truck Regulation Upload, Compliance, and Reporting System (TRUCRS) and has consistently maintained compliance using the Model Year Schedule compliance pathway.

The purpose of this letter is to express our concern regarding the proposed second 15-day amendments that would expand ACF reporting obligations to include contractor-operated fleets providing services to public agencies. While we understand CARB's objective of ensuring equitable emissions reductions, we are concerned that the proposed amendments could impose significant administrative and contractual burdens on local governments that were not contemplated when many existing service agreements were executed.

Glendale maintains several long-term contracts for critical public services, including urban forestry maintenance and franchised commercial waste collection. These agreements require compliance with applicable emissions standards established by CARB and the South Coast Air Quality Management District; however, they do not currently require contractors to provide the detailed fleet information necessary to support ongoing TRUCRS reporting. As a result, implementation of the proposed amendments may require the City to renegotiate or amend existing contracts to obtain information that is not currently required under those agreements.

Our review of existing contracts indicates that scheduled reporting of contractor vehicles and equipment is generally not required. Furthermore, most agreements do not require specific vehicles or equipment to be permanently assigned to Glendale. For example, under our franchised commercial waste collection agreements, a Class 8 front-loading refuse truck may operate in Glendale one day and be deployed to another jurisdiction the following day. Similarly, our urban forestry contractor serves multiple municipalities



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throughout Southern California, and the vehicles and equipment utilized under the Glendale contract are not dedicated exclusively to our jurisdiction. Consequently, identifying and tracking contractor assets attributable to a specific public agency may prove difficult and could result in inconsistent reporting across jurisdictions.

Within Glendale, all city-owned vehicles and equipment subject to ACF are maintained and managed by the Public Works Department, whose staff possess the expertise and operational knowledge necessary to ensure accurate reporting and compliance. By contrast, contractor agreements potentially affected by the proposed amendments are administered across numerous City departments, including Public Works, Parks, Recreation and Community Services, Glendale Water & Power, and Community Development. Requiring each department to collect, monitor, and report contractor fleet information would create a significant administrative challenge and could necessitate new processes, staffing resources, and contract management procedures.

The City has long supported the principle that public and private sector entities should be subject to comparable environmental standards. One of the longstanding concerns regarding ACF has been that local governments are subject to fleet requirements that do not apply equally to private operators, placing public agencies at a competitive disadvantage in certain service areas. However, we respectfully question whether requiring local governments to collect and report contractor fleet information is the most effective means of addressing this disparity. The proposed amendments could effectively position public agencies as an extension of the regulatory compliance and enforcement process, creating additional costs and administrative burdens without providing local governments with corresponding authority over contractor fleet operations.

We respectfully encourage CARB to continue working collaboratively with local governments to develop practical, enforceable solutions that advance California's air quality goals while recognizing the operational realities of municipal service delivery. We share CARB's commitment to reducing emissions and improving public health and look forward to continued partnership in achieving these important objectives for future generations of Californians.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel Hernandez", is written over a blue horizontal line.

Daniel Hernandez
Director of Public Works