

June 16, 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):

I appreciate the opportunity to provide comments on the second round of proposed amendments to the Advanced Clean Fleets (ACF) Regulation. My name is Hannah Abdoo and I am the Fleet Compliance Officer for the City of Long Beach Fleet Services Bureau. I remain committed to supporting California's clean transportation goals and am actively working to address the significant operational, financial, and infrastructure challenges associated with fleet electrification through my work for the City. However, I have serious concerns regarding the proposed amendments that would require local governments to monitor and report compliance information associated with private contractors performing work on behalf of municipalities.

The proposed amendments significantly expand the responsibilities of local governments by effectively requiring municipalities to oversee and administer compliance activities for private contracted fleets. This represents a substantial shift in responsibility and places cities in the role of de facto regulators of private fleets. Municipalities are not the appropriate enforcement or compliance entity for private-sector fleets, and this responsibility falls outside the traditional role of local governments in California's transition to zero-emission transportation.

I believe that the administrative and financial burden associated with these requirements would be considerable. Municipalities maintain thousands of contracts that are administered by numerous departments and bureaus. To implement the proposed requirements, contractors would need to be identified across all departments, review and revise existing contract language, establish new internal compliance procedures, update the Truck Regulation Upload, Compliance, and Reporting System (TRUCRS), and continuously track contractor fleet changes, including vehicle acquisitions, retirements, and vehicle assignments related to City work. This would require substantial coordination across departments and ongoing administrative oversight that far exceeds current staffing and resources.

Additionally, the proposed requirements fail to reflect how contractors typically manage their fleets. Most contractors do not dedicate specific vehicles to specific customers or

contracts. Requiring contractors to identify which vehicles are being used for municipal work and provide detailed vehicle information down to the VIN level, would create significant operational challenges. If a contractor works with multiple municipalities, are multiple municipalities required to report on the same vehicles? In some cases, contractors may consider such fleet information proprietary or commercially sensitive. As a result, these requirements may discourage contractors from pursuing municipal work altogether.

The proposed amendments also do not address how compliance responsibilities would apply when contractors utilize subcontractors to perform portions of contracted work. It is unclear whether municipalities would be expected to identify, monitor, and report compliance information for subcontractor vehicles in addition to those operated by the primary contractor. The absence of clear guidance regarding subcontractor compliance creates uncertainty for municipalities, contractors, and subcontractors alike, and further demonstrates the challenges associated with assigning contractor fleet compliance responsibilities to local governments.

I am particularly concerned that the increased financial and administrative burden imposed on contractors will reduce competition for public contracts. Municipal procurement already involves extensive compliance obligations, reporting requirements, and contracting provisions. Adding another layer of fleet reporting and tracking requirements may deter qualified firms from bidding on municipal contracts, particularly smaller businesses with limited resources. Reduced competition can increase costs to taxpayers and hinder municipalities' ability to deliver services efficiently, including emergency services.

I also note that one of the stated objectives of the proposed amendments is to provide greater flexibility within the ACF program. However, the contractor compliance provisions would have the opposite effect for local governments. Rather than simplifying implementation, these requirements would introduce significant complexity, create new administrative processes, and increase compliance costs for both municipalities and contractors.

Equally concerning is the absence of any dedicated funding to support local governments in carrying out these additional responsibilities. Cities throughout California continue to face budget constraints and competing fiscal priorities. The administrative burden associated with monitoring contractor fleets would inevitably translate into increased personnel, contracting, and compliance costs. These are unfunded mandates that many municipalities are not equipped to absorb.

Local governments also have a unique responsibility to provide essential public services, including emergency response, public safety, utility operations, and disaster recovery. Municipalities must maintain the ability to quickly procure services and execute contracts to ensure these critical services are available when needed. Any regulatory requirement that limits the availability of contractors or delays the contracting process may negatively affect a city's ability to respond to emergencies and serve its residents.

Finally, it is important to recognize the broader context in which municipalities are implementing California's fleet regulations. Local governments are already navigating multiple CARB programs and compliance obligations, including requirements related to off-road diesel equipment, the Portable Equipment Registration Program (PERP), Zero-Emission Forklift regulations, Commercial Harbor Craft regulations, and other air quality initiatives. At the same time, municipalities are competing for limited electrical infrastructure upgrades, coordinating with utilities to secure sufficient power capacity, addressing supply chain and vehicle availability challenges, and managing significant budget constraints.

Despite these challenges, municipalities continue to make good-faith efforts to comply with CARB's evolving regulatory framework, invest in charging infrastructure, and deploy zero-emission vehicles wherever operationally feasible. However, the proposed contractor fleet oversight provisions would add a substantial layer of complexity to an already challenging transition. Rather than advancing the stated goal of regulatory flexibility, these requirements risk diverting limited local resources away from the actual deployment of zero-emission vehicles and infrastructure. More importantly, they may undermine the collaborative partnership that has been essential to municipalities' support for and implementation of California's clean transportation goals.

For these reasons, I respectfully request that CARB reconsider the proposed amendments that place responsibility for contractor fleet compliance oversight on municipalities. Local governments should remain responsible for compliance related to their own fleets, while private fleet operators should retain direct responsibility for meeting applicable regulatory requirements. Removing or substantially revising these provisions would better align with the stated goals of flexibility, reduce unnecessary administrative burdens, and support continued participation by contractors that provide essential services to California communities.

Thank you for your consideration of these comments and for your continued partnership with local governments as California advances its transportation and air quality goals.

Sincerely,

Hannah Abdoo
Fleet Compliance Officer
City of Long Beach Fleet Services Bureau