



**City Council**  
311 Vernon Street  
Roseville, California 95678

September 12, 2025

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

Submitted via: [ZEVFleet@arb.ca.gov](mailto:ZEVFleet@arb.ca.gov) and [CARB's Public Comment Portal](#)

**Re: City of Roseville Comments on the 45-Day Package (Proposed Amendments) to the Advanced Clean Fleets Regulations and Low Carbon Fuel Standard and anticipated topics in the upcoming 15-Day Package**

Dear Dr. Cliff:

On behalf of the City of Roseville (Roseville), Roseville appreciates the opportunity to comment on the 45-Day package proposed amendments to the Advanced Clean Fleets (ACF) regulation and respectfully encourages the California Air Resources Board (CARB) to consider further refinements in forthcoming 15-Day package(s).

Roseville is the largest city in Placer County, with a population exceeding 163,000 and encompassing 44.14 square miles. Roseville is unique in that we are a full-service city providing essential utility and public services, including public safety, electricity, water, wastewater, solid waste management, public works, transit, and parks and recreation. Roseville's utilities serve over 60,000 residences and businesses, necessitating a large and diverse fleet capable of meeting daily operational demands as well as extraordinary circumstances, including emergencies, natural disasters, and mutual aid support to local, state, and federal agencies.

Roseville is committed to sustainability. Our Energy Recovery Project, which implements a circular economy by converting biosolids and food waste into renewable natural gas (RNG) to fuel our refuse fleet and offset energy consumption onsite, exemplifies our commitment to reducing emissions and reliance on fossil fuels.

Throughout the Advanced Clean Fleets (ACF) regulatory process, Roseville emphasized the critical role of our Waste-to-RNG project and the potential impacts on our ratepayers. Unfortunately, the final wastewater and refuse fleet provisions did not address these concerns. Instead, they prevent Roseville from deploying new low-NOx RNG engines, forcing us to retain diesel trucks. This not only undermines the progress of early adopters of lower-carbon technologies but also penalizes leadership rather than rewarding it. As a result, Roseville cannot achieve the projected return on investment for our customers and partners, nor can it realize the significant fuel cost savings that broader use of RNG would have provided. This outcome represents a missed opportunity to advance California's carbon neutrality goals through practical,

community-based solutions, particularly Roseville's vision of a circular economy where biogas from our wastewater treatment process is converted to RNG to fuel the very fleets that deliver essential services.

### **Roseville's Core Issue**

In 2017, Roseville identified an opportunity to create a circular economy with our waste stream. Legislative signals, including Senate Bill 605 Lara (Chapter 523, Statutes 2014), Senate Bill 1383 Lara (Chapter 395, Statutes 2016), and Assembly Bill 1826 Chesbro (Chapter 727, Statutes of 2014), encouraged leveraging our waste stream for a beneficial use to reduce methane emissions and decrease reliance on fossil fuels.

Capturing our wastewater treatment methane emissions enables us to displace over 250,000 gallons of diesel annually with locally generated RNG. This process relies solely on local production without dependence on pipelines or credits, thereby further lowering the carbon intensity of the fuel. When paired with low-NOx engines, lifecycle emissions performance is expected to exceed that of battery-electric trucks operating with off-peak evening charging.

To implement this innovative project, Roseville received approximately \$7 million in grant funding from the Carl Moyer Infrastructure Grant Program and the California Energy Commission.

### **Lifecycle Carbon Intensity**

As California seeks to reduce global climate emissions, it is important to account for the full lifecycle of the energy and paired end-use. Based on CARB's Low Carbon Fuel Standard pathways, 2020 carbon intensity (CI) for off-peak (after 9 pm) evening charging ranges from 112.14 gCO<sub>2</sub>e/MJ to 79.35 gCO<sub>2</sub>e/MJ, with the grid average between 9 pm and 5 am at 85.19 gCO<sub>2</sub>e/MJ. Adjusted energy economy ratio (EER) values for battery-electric medium-duty applications yield approximately 25.06 gCO<sub>2</sub>e/MJ. Provisional RNG pathways, such as Roseville's wastewater-biosolids project, result in a CI of 15.87 gCO<sub>2</sub>e/MJ to 19.28 gCO<sub>2</sub>e/MJ.

Early deployment of RNG in Roseville's fleet thus achieves 26 to 45% lower CI compared with the current evening grid average. During drought years and summer heatwaves, which contributed to the 2021 and 2022 load-shedding events, grid CI is expected to rise further, exacerbating emissions from battery-electric trucks charging under this regulation.

### **Comments on CARB's 45-Day Regulatory Package**

#### ***1. Definition of Near-Zero Emission Vehicle (NZEV) (Section 2013(b))***

According to the Union of Concerned Scientists, California's medium- and heavy-duty fleets operate approximately 1.86 million vehicles. As CARB reports in Appendix H-1 of the ACF Rule, state and local governments own and operate roughly 125,000 vehicles, representing just 6.72% of all fleets. With federal restrictions limiting California's ability to broadly require electrification of all fleets, the responsibility and associated costs of driving innovation now fall primarily on state and local governments. Consequently, the cost burden is disproportionately borne by our utility ratepayers.

In order to make meaningful progress towards the state's goal of carbon neutrality by 2045, we applaud CARB for reevaluating the role that biomethane (RNG) can play in the near-term. To help address this gap, Roseville concurs with the California Association of Sanitation Agencies (CASA) request for further modifications to the NZEV definition, as noted in bold below.

"Near-zero-emission vehicle" or "NZEV" means one of the following:

- (A) An on-road plug-in hybrid electric vehicle which has the same definition as that in 40 CFR section 86.1803-01, amended on July 1, 2011, incorporated by reference herein, that achieves all-electric range as defined in section 1963(c); or
- (B) An on-road hybrid electric vehicle that has the capability to charge the battery from an off-vehicle conductive or inductive electric source and achieves all-electric range as defined in section 1963(c); or

**(C) An on-road low NO<sub>x</sub> vehicle fueled by biomethane (or RNG) fuel.**

**2. Additional Definitions Needed to Support RNG-Powered Vehicles**

Roseville supports CASA's recommendation for adding definitions for biomethane, low NO<sub>x</sub> vehicle, and RNG to the regulation or directly referencing definitions for biomethane and RNG included in the Low Carbon Fuel Standard as provided in their comment letter:

- "Biomethane" means methane derived from biogas, or synthetic natural gas derived from renewable resources, including the organic portion of municipal solid waste, which has been upgraded to meet standards for injection to a natural gas common carrier pipeline, or for use in natural gas vehicles, natural gas equipment, or production of renewable hydrogen. Biomethane contains all of the environmental attributes associated with biogas and can also be referred to as renewable natural gas. (Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95481)
- "Low Oxides of Nitrogen (Low NO<sub>x</sub>) vehicle" refers to a heavy-duty internal combustion engine vehicle that is capable of achieving 50%, 75%, or 90% below the 0.20 g/bhp-hr NO<sub>x</sub> emission standard.
- "Renewable Natural Gas (RNG)" is an alternate term for "biomethane." (Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95481)

**3. Mutual Aid Assistance (Section 2013.2(e))**

Roseville appreciates the updates proposed by CARB staff to address the implementation of AB 1594; however, Roseville believes these updates do not go far enough, and additional modifications are necessary. Recent events have underscored the vital role that local government utilities play in emergency response, disaster recovery, and mutual aid.

Roseville strongly supports the comments submitted by CMUA and NCPA, i.e., "Joint Public Agencies", regarding mutual aid and emergency response. Roseville agrees that vehicles qualifying under this exemption should be recognized for both emergency response and mutual aid purposes, ensuring flexibility for public agencies during critical events.

Roseville also agrees that the current 25% minimum ZEV threshold creates an unreasonable barrier to accessing the exemption and should be omitted from the regulation. Fleets may be unable to meet the threshold due to factors beyond their control, such as ZEV availability, retirement schedules, operational reliability requirements, or delayed procurement timelines. Tying emergency response vehicle decisions to these unrelated limitations jeopardizes fleet readiness

and emergency response capacity. Further, we support the recommendation to remove mobile fueling documentation requirements from the Mutual Aid and Emergency Response exemptions. At a minimum, CARB should delay any mobile fueling requirements until 2035 to allow time for technological advancement, field testing, and evaluation of the ZEV market. After that point, CARB could revisit whether mobile fueling should be considered as part of the Mutual Aid exemption.

While we appreciate CARB's recognition of mutual aid in the regulation, the current criteria are overly burdensome and, in practice, prevent public agency utilities from utilizing the exemption to procure necessary emergency response vehicles. For these reasons, Roseville supports CMUA's proposed amendments to Section 2013.2(e), as detailed in CMUA's "Appendix A."

### **In Closing**

Roseville respectfully urges CARB to:

- Revise the NZEV definition to include low-NOx RNG vehicles.
- Adopt clear supporting definitions for RNG pathways.
- Modify the mutual aid exemption to ensure practical, workable criteria.

Additionally, as a member of the California Municipal Utilities Association, the Association of California Water Agencies and the California Association of Sanitation Agencies, Roseville actively engaged in their ACF workgroups and supports the written comments and requested modifications made by our statewide trade associations.

Roseville remains committed to California's carbon neutrality goals and believes these refinements will allow early adopters like Roseville to continue reducing emissions while maintaining reliable essential services. By using locally generated RNG from our wastewater treatment process to fuel fleet vehicles, Roseville is creating a community-based solution that further advances emission reductions and sustainability. Roseville appreciates the opportunity to provide these comments and stands ready as a local example for CARB members and staff to coordinate follow up visits to assist you in reaching policy conclusions that validate and protect our investments in cleaner air for our residents and the region.

If you or your staff have any questions, please contact Noelle Mattock at 916-297-2177 or [ncmattock@roseville.ca.us](mailto:ncmattock@roseville.ca.us).

Sincerely,



Krista Bernasconi, Mayor  
City of Roseville

cc: Liane Randolph – CARB Board Chair  
Eric Guerra – CARB Board Member  
Rajinder Sahota – CARB Deputy Executive Officer, Climate Change & Research  
Jill Firch – Air Pollution Specialist  
Dane Hutchings – California Public Policy Group  
Jason Gonsalves – Gonsalves & Sons