



City Council
311 Vernon Street
Roseville, California 95678

April 16, 2026

The Honorable Dr. Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Submitted via CARB Public Comment Portal

Re: City of Roseville Comments on 15-Day Modifications to the Advanced Clean Fleets Regulation (Title 13, CCR, Sections 2013 et seq.)

Dear Dr. Cliff:

On behalf of the City of Roseville (Roseville), we appreciate the opportunity to comment on the California Air Resources Board's (CARB) proposed 15-day modifications to the Advanced Clean Fleets (ACF) regulation.

Roseville recognizes CARB's efforts to respond to Board direction and stakeholder input through the 15-day amendments. In particular, we appreciate the following updates:

- Extension of the ZEV Purchase Schedule requirements timeline, including maintaining the 50 percent purchase requirement through 2030 (Section 2013.1(a)(1)(B));
- Expansion of the ZEV Purchase Exemption Streamlined List (Section 2013.2(d)(1)(A)) to include additional vehicle types, such as digger derricks, combination vacuum-jetter trucks, jetter trucks, and certain Class 2b and 3 pickups;
- Modifications to exemption timing, allowing requests to be submitted closer to compliance deadlines and improving administrative processing timelines;
- Adjustments to the Fleet Resiliency Exemption, including lowering the minimum ZEV threshold required to qualify (Section 2013.2(e)); and
- Additional criteria to evaluate vehicle availability, providing more structure to exemption determinations (Section 2013.2(d)(2)(D)).

These updates reflect continued engagement with public agencies and represent progress in addressing implementation challenges. However, as discussed below, these updates do not resolve several core implementation challenges and, in some cases, introduce new challenges for public agencies, like Roseville.

Roseville Context and State Policy Alignment

Roseville is the largest city in Placer County, serving more than 160,000 residents and providing a full range of essential public services, including water, wastewater, solid waste, electric, and public works. These services rely on a diverse and operationally complex fleet that must function reliably under both routine and emergency conditions.

Roseville has acted in direct response to State policy direction over the past decade, including SB 1383 and related organics and methane reduction requirements, by investing in a circular economy approach that captures wastewater-derived methane, incorporates diverted high-strength organic waste, and converts it into renewable natural gas (RNG) to fuel our refuse fleet and offset energy use at our facility. This investment reduces lifecycle greenhouse gas emissions and displaces fossil fuels with locally produced renewable energy.

Rather than being recognized as a model for achieving near-term emissions reductions, the current ACF framework, as proposed to be amended, limits our ability to fully utilize this resource as intended and undermines the return on investment made on behalf of our ratepayers. Roseville designed its Energy Recovery Project to use RNG as a transportation fuel for our refuse fleet, which our analyses identified as the highest and best use of this resource. As structured, the amendments continue to penalize early adopters that implemented State-directed solutions in good faith and discourage similar investments moving forward.

Incremental Improvements Do Not Resolve Core Implementation Challenges

While the amendments provide incremental improvements, including clarification on exemptions, expanded eligibility for certain vehicle types, including updates to the ZEV Purchase Exemption List (Section 2013.2(d)(1)(A)), and limited flexibility related to fleet resilience and infrastructure delays, they remain largely procedural and do not resolve the fundamental issues raised by Roseville and our statewide partners. In several cases, incremental flexibility is paired with additional limitations, documentation requirements, or discretionary approval standards that introduce further administrative burden and uncertainty for public agencies.

The 15-day amendments continue to rely on narrow, conditional exemptions rather than establishing a workable and scalable compliance pathway for public agencies like Roseville.

For example:

- Expanded exemptions and clarifications are paired with increased documentation and reporting requirements, as well as discretionary authority for approval, creating uncertainty in their practical application and long-term fleet planning.
- The Fleet Resiliency Exemption (Section 2013.2(e)), formerly the Mutual Aid provision, has been expanded; however, it remains constrained, including a cap limiting use to a portion of the fleet, and does not provide sufficient flexibility for essential service fleets operating in emergency response and mutual aid environments. Roseville is a full-service city providing essential public services

including water, wastewater, solid waste, electric, and public works. These services rely on a diverse and specialized fleet that must remain operational under all conditions, including emergency response and mutual aid. In practice, emergency events often require simultaneous response across multiple service areas, including maintaining water supply and wastewater operations, debris removal, and electric system restoration. These events do not occur in a manner that allows for partial fleet deployment. Depending on the nature and scale of the incident, the City may need to mobilize its full fleet to maintain continuity of service and protect public health and safety. Limiting flexibility to a capped portion of the fleet does not reflect these operational realities and introduces risk during critical response scenarios.

- Clarifications related to leased and contracted fleets introduce ambiguity regarding how these vehicles are treated within a public agency's compliance framework. While the amendments appear to limit direct regulatory applicability to publicly owned fleets, certain provisions, particularly within the ZEV Milestones compliance pathway, create scenarios in which contracted vehicles may influence a public agency's ability to demonstrate compliance. Public agencies routinely rely on contracted service providers to perform essential functions. To the extent that compliance pathways or flexibility mechanisms are contingent on fleet characteristics that may include contracted vehicles, this structure introduces operational and contractual complexity and complicates long-term planning.

Taken together, these changes increase administrative complexity, without resolving the core issue of how public agencies can realistically comply with the regulation while maintaining reliable service delivery.

Lack of a Viable RNG Compliance Pathway

The 15-day amendments do not address the central issue raised by Roseville and our statewide partners: the absence of a viable and scalable compliance pathway for the use of renewable natural gas as a transportation fuel.

As currently structured:

- RNG is not recognized as a compliance pathway under the ZEV Purchase Schedule requirements (Section 2013.1).
- Its use remains constrained within the Milestones compliance pathway (Section 2013.6) and limited to narrow, conditional exemptions that are not scalable across fleet operations.

Roseville's Energy Recovery Project was designed to convert local waste streams into transportation fuel for our refuse fleet. As a result of the current regulatory structure, Roseville is unable to fully utilize RNG for its intended purpose, limiting the community's ability to realize these benefits today, including:

- Displacement of over 250,000 gallons of diesel annually;
- Immediate greenhouse gas emissions reductions from use of a low-carbon, locally produced fuel; and

- Cost savings that would otherwise reduce ratepayer impacts associated with fleet operations.

The 15-day amendments introduce a framework tied to “excess” renewable biofuel production, which does not align with how Roseville designed and operates its system to produce and utilize RNG as a primary transportation fuel.

- The requirement to demonstrate “excess” capacity creates uncertainty regarding how existing uses are treated;
- This approach may constrain future fleet use of RNG, even where sufficient production exists.

As structured, the amendments continue to penalize early adopters and limit the ability of Roseville to deliver near-term emissions reductions using available, proven technology.

Need for Regulatory Certainty and Workable Implementation

Public agencies require regulatory certainty, feasible technology pathways, and alignment with existing State policy investments to successfully transition their fleets over time.

While many of the 15-Day revisions aim to streamline implementation, the City of Roseville remains concerned with the changes to Section 2013.1(f). This provision requires fleets to demonstrate that exemption-eligible vehicles reduce required ZEV purchases; however, CARB’s stated intent, that exemptions should not be granted if other ZEV options are available, introduces a level of rigidity that undermines the purpose of the purchasing pathway.

In practice, this structure introduces several implementation challenges:

- The language limits a fleet’s ability to utilize the 50 percent procurement flexibility prior to 2030, which was intended to allow agencies to deploy ZEVs where feasible while maintaining internal combustion engine (ICE) vehicles where necessary.
- A single exemption request could trigger a broader review of all ICE purchases, effectively shifting decision-making from the fleet to CARB and disregarding operational realities, infrastructure constraints, and mission-critical needs. At a minimum, the Fleet Resiliency Exemption should be excluded, as resiliency planning is distinct from ZEV availability and is essential for maintaining reliable service.
- Fleets may be required to justify every ICE purchase within a given year, creating a resource-intensive process, particularly for larger fleets, that runs counter to the goal of streamlining compliance.
- While the Streamlined ZEV Purchase Exemption is intended to reduce upfront requirements, the potential for retroactive review and denial introduces uncertainty and shifts the burden to year-end reporting, when corrective action is far more difficult and costly.

- Public agency fleets operate within dynamic, multi-year capital plans that must adapt to funding, supply chain, and operational changes. Requiring detailed annual purchase projections raises concerns about how plans will be evaluated and limits the flexibility needed to ensure reliable service and responsible use of public funds.

These provisions do not provide a stable or predictable framework for long-term planning, procurement, or infrastructure investment.

In addition:

- Ongoing uncertainty regarding vehicle availability continues to limit feasible procurement options;
- Infrastructure readiness remains a significant constraint for medium- and heavy-duty fleet electrification; and
- Emerging concepts such as mobile fueling lack sufficient clarity to support implementation planning.

These factors increase risk for public agencies and further complicate compliance with the regulation. Roseville encourages CARB to further evaluate and refine this provision to preserve flexibility, reduce administrative burden, and support practical and fiscally responsible implementation.

Disproportionate Impact on Public Agencies

Following the withdrawal of the federal waiver request, the regulation now applies to state and local government fleets, which represents approximately 7 percent of the state's entire medium- and heavy-duty fleet. As a result, a limited subset of entities is being required to shoulder a disproportionate share of the cost and implementation burden.

For public agencies, these costs are borne directly by utility ratepayers and have real implications for the affordability of essential services. This approach places the burden of achieving statewide policy goals on a narrow group of public entities and their ratepayers, rather than across the broader fleet where the majority of emissions occur.

Statewide Association Alignment

Roseville is actively engaged with the Association of California Water Agencies (ACWA), the California Association of Sanitation Agencies (CASA), and the California Municipal Utilities Association (CMUA), and supports the comments and recommended modifications submitted by these organizations and encourages CARB to address the issues they have identified.

Roseville remains committed to California's climate goals and to advancing practical, community-based solutions that reduce emissions while maintaining reliable essential services. However, as currently structured, the regulation continues to penalize early adopters and limit the ability of Roseville to fully utilize available, proven technologies to achieve near-term emissions reductions.

We appreciate the opportunity to provide comments and look forward to continued engagement with CARB to identify workable, durable solutions.

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

Sincerely,



Krista Bernasconi, Mayor
City of Roseville

cc: The Honorable Lauren Sanchez, Chair, CARB
The Honorable Lynda Hopkins, Board Member, CARB
The Honorable Eric Guerra, Board Member, CARB
The Honorable Patricia Lock Dawson, Board Member, CARB
The Honorable Dr. Tania Pacheco-Warner, Board Member, CARB
The Honorable Dr. Susan Shaheen, Board Member, CARB
The Honorable Dr. John Balmes, Board Member, CARB
The Honorable Cliff Rechtschaffen, Board Member, CARB

Zoe Heller, Director, CalRecycle
Linnea Whitney Skierski, Deputy Director, Office of Policy and Developmental Analysis
Cara Morgan, Deputy Director, Division of Material Management and Local Assistance
Michelle Martin, Deputy Director, Division of the Circular Economy

Nick Blair, Association of California Water Agencies
Sarah Deslauriers, California Association of Sanitation Agencies
Derek Dolfie, California Municipal Utilities Association
Damon Conklin, League of California Cities
Justin Caporusso, Mountain Counties Water Resources Association