



City Council
311 Vernon Street
Roseville, California 95678

October 29, 2021

Mr. Craig Segall
Deputy Executive Officer of Mobile Sources and Incentives
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Fleets Draft Regulation – Public Fleet Requirements and Cost Assumptions

Dear Mr. Segall:

On behalf of the City of Roseville (Roseville), I write to provide comments to the Air Resources Board (Air Board) regarding the Advanced Clean Fleets (ACF) Draft Regulation, specifically the provisions for public fleets and the cost assumptions.

Roseville is the largest city in Placer County with a population over 146,594 and 42.26 square miles of land. As a full-service city, Roseville provides most essential utility and public services to its citizens, everything from public safety, electricity, water, wastewater, to solid waste management. These utilities serve just under 50,000 residences and businesses. This requires the city to maintain a large, diverse, and capable fleet. Roseville is committed to sustainability and can appreciate the task the Air Board is trying to accomplish with this rulemaking.

Due to the nature of Roseville's fleet operations, need for emergency response, integrated utilities and interplay with other state compliance obligations, we write to share our comments, concerns, and recommendations to amend the regulation prior to adoption.

Circular Economy

In 2017, Roseville saw the opportunity to develop a "closed loop" with its waste stream. A confluence of legislation, 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) sent a strong signal that the most logical solution was to leverage our waste stream for a beneficial use that reduced our methane emissions and reduced our reliance on fossil fuels.

Capturing our landfill and wastewater treatment methane emissions will reduce consumption of over 250,000 gallons of diesel and be replaced with locally generated and controlled renewable natural gas. With our landfill and wastewater treatment facilities adjacent to one another there is no reliance on pipelines or crediting to achieve this outcome, thus further lowering the carbon intensity of the fuel. Paired with low-NOx engines and the environmental outcomes on a lifecycle basis, we expect to exceed what can be expected from battery electric trucks charging during off-peak evening hours.

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 Air Board's own low-carbon fuel standard pathways we know that the 2020 carbon intensity for off-peak (after 9pm) evening charging ranges from 112.14

gCO₂e/MJ to 79.35 gCO₂e/MJ and that the grid average between 9pm and 5am is 85.19 gCO₂e/MJ¹. Adjusted energy economy ratio (EER) values for battery medium duty application is 3.4² or ~25.06 gCO₂e/MJ. Provisional pathways in California for wastewater sludge and landfill like Roseville's project result in a CI of 15.87 gCO₂e/MJ to 19.28 gCO₂e/MJ. Early investment by Roseville to deploy renewable natural gas (RNG) to our fleet provides a ~44.91% to 26.07% lower carbon intensity from the evening grid average today over a future vehicle that does not currently exist. Furthermore, we anticipate during drought years and with the stress of summer heat waves that the 2021 and near-term evening grid carbon intensity will continue to rise. This will further be exacerbated by the demand for charging created by this regulation.

Roseville believes in striving to be the best environmental steward through sound investment and policy. With the management of wastewater and solid waste we believe that for the foreseeable future using RNG in low-NO_x specialty vehicles in the refuse fleet will provide better environmental outcomes for our residents' fees and taxes. At this time there are no zero-emission vehicles that can serve our routes without substantial disruption to the services and costs of those services to the residents of our city.

The Air Board should not foreclose this environmentally sound option at this time and instead allow Roseville and other municipalities in control of their wastewater and solid waste streams to achieve compliance with this regulation and others required by statute.

Emergency Response

In the event of minor or major emergency responses to natural or manmade disasters Roseville needs maximum flexibility to deploy and field as many assets and resources to that event, or as has been the case lately, multiple events. While we appreciate the recognition of this need by Air Board staff, we remain concerned that a 75% zero-emission vehicle (ZEV) requirement might be overly burdensome and unattainable. With smaller utilities like Roseville, emergency response requires deploying every vehicle in the fleet in addition to the ability to provide mutual aid to other communities in need.

Emergency responses often require vehicles from our various utilities including electrical, water and wastewater utilities. Utility response to certain types of emergencies including natural disasters like fires, floods, spills, hazardous waste cleanups, and earthquakes, requires optionality and flexibility in the resources deployed. We are not currently confident in the infrastructure rollout statewide or the capabilities of compliant vehicles to commit to the narrowness of this requirement. We would respectfully suggest the Air Board leave these requirements open ended until thresholds of regional (beyond California) infrastructure availability and the capability of vehicles can achieve a direct replacement with equivalent duty cycles for the vehicles they are replacing.

Exemption Process

Roseville supports a simplification of the exemption process in this proposal. As opposed to every fleet generating an unknown and likely substantial amount of paperwork in the necessary cases for exemptions, we believe the Air Board should establish a technology clearinghouse. Like previous technology forcing rules adopted by the Air Board, two original equipment manufacturers (OEMs) should be able to serve each segment before any compliance timeline is started for those vehicles. Public entities such as cities, counties, and utilities have stringent contracting requirements and should not be required to award sole-source contracts for compliance if there are fewer than two certified vehicles for that body type and weight class.

¹ https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/tier2/elec_update.pdf

² https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/guidance/lcfsguidance_20-04.pdf

Furthermore, we have substantial concerns about reliance on startups and lesser-established manufacturers entering this space. These concerns stem from the real possibility that these companies have unproven technology and unknown abilities to manufacture and deliver serviceable products at scale. We suggest that the Air Board require OEMs, prior to certification of their offerings for compliance with this regulation, be able to keep delivery timelines in-line with those currently experienced with diesel trucks. The ability to demonstrate and take a purchase order is not sufficient when our compliance with state regulation is on the line. OEMs that do not have regional service centers or authorized repair vendors within 50 miles of a compliance entity's yard should also be excluded from consideration as a compliant vehicle. Without proximate service options, Roseville further suggests that OEMs, which do not offer fleet technician training, be excluded from consideration as compliant vehicles for this regulation.

While this may seem difficult to achieve, it reflects the seriousness and necessity that this regulation fully contemplates, the implications to the fleet's operations, and ability to self-service or have service conveniently within proximity of the fleet. Roseville needs these vehicles to keep up basic and required services for our city and we cannot afford to allow a startup with unestablished abilities use our community to Beta test new technology from afar.

Near-Zero Definition

The Air Board's definition of near-zero is not reflective of commercially available or contemplated vehicles coming to market. While we understand that this is a technology-forcing regulation the narrowness and current state of the market should require a more reasonable approach.

Roseville supports a definition of near-zero that is inclusive of vehicles that would comply with South Coast Air Quality Management District Rule 1196. This standard achieves 90% lower NOx emissions compared to current heavy-duty vehicles and when paired with RNG, the lifecycle emissions are lower than all-electric heavy duty vehicles charged from the grid as previously discussed.

Cost Assumptions

Roseville is currently in the process of developing a "charging island" at one of our corporation yards. This project will provide approximately 90 level 2 chargers for the city fleet and to charge up to 30 buses. Roseville is in a unique position with its own publicly owned electric utility. As these plans progress, we will reach out to the Air Board to share those costs directly.

Based on our citywide fleet turnover, we anticipate needing on average of 40 medium and heavy duty vehicles to be purchased each year. Currently the difference in costs is 85% more expensive per vehicle while only handling 50% of the current routes. While we anticipate that these costs will come down over time, it is currently more environmentally and economically beneficial for portions of our fleet to transition to RNG and low-NOx engines for the foreseeable future.

The Air Board should not conclude that the current ZEV offerings are 1:1 replacement as many of the stated capabilities are projected and unproven. Based on our experience true 1:1 replacement will need to have a range of 170% more than the vehicles being offered for our refuse fleet. Additionally, the buses being purchased are only capable of handling commuter routes and not the intra-city routes.

If required to follow the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple utilities throughout the city. In a time of economic uncertainty and rising utility costs, due to substantial mandates across regulatory bodies, we caution the Air Board from unnecessarily being over aggressive in this rulemaking and further exacerbating the

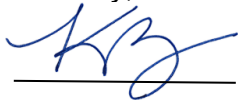
affordability issues facing many residents of this state. Utility cost increases have a disproportionate effect on low-to-middle income households. This instant rulemaking is not an isolated instance. Several other State-level regulatory proceedings at the State Water Resources Control Board, for instance, are also contemplating cost-increases that will be passed on to utility ratepayers.

Conclusion

Roseville is pursuing a progressive, environmentally sound, and robust strategy to decarbonize our city. We want to ensure that policy does not overburden our residences and add to the mounting regulatory costs of California's rigorous goals. We look forward to continuing to work with the Air Board on striking an appropriate balance to initiate the development of compliant vehicles, while mitigating the costs to the residents and businesses we serve.

If you or your staff have any questions, please contact Noelle Mattock at (916) 297-2177 or NCMattock@Roseville.ca.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KB', is written over a horizontal line.

Krista Bernasconi, Mayor
City of Roseville

cc: Board Members, California Air Resources Board
Richard Corey, Executive Officer, ARB
Craig Segall, Deputy Executive Officer, ARB
Sydney Vergis, Chief, ARB
Tony Brasil, Branch Chief, ARB
Joe A. Gonsalves & Son
The Gualco Group, Inc.



City Council
311 Vernon Street
Roseville, California 95678

October 17, 2022

Ms. Liane Randolph
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Fleets Draft Regulation

Dear Chair Randolph:

On behalf of the City of Roseville (Roseville), I write to provide comments to the California Air Resources Board (CARB) regarding the Advanced Clean Fleets (ACF) Draft Regulation, specifically the provisions for public fleets and the cost assumptions.

Roseville is the largest city in Placer County with a population over 141,500 and 42.26 square miles of land. As a full-service city, Roseville provides most essential utility and public services to its citizens, everything from public safety, electricity, water, wastewater, to solid waste management. These utilities serve just under 50,000 residence and businesses. This requires the city to maintain a large, diverse, and capable fleet. Roseville is committed to sustainability and can appreciate the task the ARB is trying to accomplish with this rulemaking; however, CARB has failed to address our concerns which will lead to burdensome tax and fee increases to comply with a regulation that “ignores market realities.”¹ While some minor accommodations have been made to allow finite flexibility for Roseville’s fleet, the proposed rule fundamentally undermines a major capital outlay project that will lead to unnecessary tax/fee burdens for our residents without significant environmental benefits.

SB 1383 Compliance

This technology forcing rule creates conflict with public agencies and their ratepayers that faithfully invested in statutory compliance to mitigate methane and divert organics from landfills. In our prior letter² and several meetings with board staff we have raised the conflict that this rulemaking creates with the energy recovery project developed to comply with statutory obligations the city has for organic waste and methane mitigation. Roseville’s organics diversion and methane recovery project was financed with use in an ultra-low NO_x fleet of refuse trucks.

The emission reductions from the utilization of biogas in our refuse fleet exceed the benefits of adoption of zero-emission trucks based on our analysis of electricity carbon intensity during the time of day this fleet would be charging compared to the carbon intensity of the biogas generated from anerobic digestion of diverted organics.

Municipalities, publicly owned wastewater treatment plants (POTWs), and refuse fleets should be provided dispensation through an alternative compliance pathway in this rule as the economic and environmental value of mitigating the short-lived climate pollutant, methane, exceeds the benefits of

¹ <https://www.calcities.org/news/post/2022/09/28/proposed-zero-emission-fleet-regulations-place-heavy-burden-on-cities-ignore-market-realities>

² <https://www.arb.ca.gov/lists/com-attach/116-acf-comments-ws-VTYAaQd0Aw9WMQdk.pdf>

forcing adoption of zero-emission vehicles (ZEV). “Early investment by the city to deploy RNG to our fleet provides a ~44.91% to 26.07% lower carbon intensity from the evening grid average today...”³

This rule incentivizes perpetual use of diesel with a carbon intensity over five times greater than biogas, until the transition to ZET is viable forgoing the near term, almost immediate, and significant emission reductions from the utilization of biogas in the refuse fleet. Without the option to utilize biogas produced from the energy recovery project that was executed to comply with CARB’s Short-lived Climate Pollutant Strategy, the City will be upside down⁴ on the financing which was based on displacement of diesel procurement with the facility generated biogas. Due to requirements of this rule the City will need to divert capital away from procurement of an ultra-low NOx fleet to use this biogas and toward ACF compliance and infrastructure needs, leaving diesel as the primary driver of the City’s refuse fleet. By limiting SLCP mitigation at this facility to power generation from biogas in microturbines, the cost and financing issues will be exacerbated, not to mention that surplus of biogas that will need to be flared or injected into a pipeline at a significantly lower economic and environmental value to the taxpayers.

Keep Working

We want to reiterate our previous comments⁵ about the exemption process, cost-assumptions, near-zero definition, and emergency response. These concerns are broadly shared and should be worked out prior to adoption. This rulemaking continues to cause significant compliance and cost concerns that have not been addressed in the last year and we urge the Board Members at CARB to order staff to keep working. Adopting this regulation on October 27th undermines stakeholders and the public’s ability to get the necessary changes for a cost-effective transition that matches the capacity to pay and availability of no-regret technology adoption.

For example, the May draft included updates based on purchase orders, but the current draft has a change that states:

“(d) (1) (A) Starting January 1, 2024, 50 percent of the total number of vehicle additions to the California fleet in each calendar year must be ZEVs; and”

This amendment creates uncertainty and further puts CARB staff in a position to make discretionary decisions in interpretation should an enforcement action be needed. This enforcement discretion is woven throughout the rule including the exemption process which is far too burdensome on CARB staff and the number of compliance entities to be feasible or efficient.

Additionally, fleet operators like the City do not have enough experience or even testing with many of the vehicles CARB staff claims to be available. This lack of testing and trials creates tremendous uncertainty and doubt that these vehicles can sufficiently complete their daily tasks and meet the needs of the various departments that the City has to service the public good. The claims of vehicle manufacturers are not meeting the reality of the demonstrations when we are able to test them and in the case of refuse and utility fleets there is virtually no experience with power takeoffs (PTO) and the equipment that our current fleet powers.

Beyond the conflicts with existing policy and issues with the pace of infrastructure or lack of real-world experience with the new technology, this rule is structurally cumbersome and needs to be reworked prior to adoption. As many stakeholders with compliance entities have raised, this rule is simply not ready to be implemented and CARB should take the time to keep working through the details prior to voting on this rule.

³ Ibid

⁴ Project financing was based on approximately \$3.50-\$4.00/gallon diesel, if cost recovery is focused on stationary power generation a diesel gallon equivalent of natural gas is approximately 3 times less valuable.

⁵ Ibid

Cost-Effective and Technologically Feasible...

Roseville remains concerned with the cost-effectiveness and technological feasibility of this rule, specifically as it pertains to our refuse fleet and vehicles with power takeoffs (PTOs) needed for the hydraulic system that operates container lifting arms and compactors. While ranges of some of the larger concept vehicles proposed as solutions for our refuse fleet might achieve route distances there is no information or study, to our knowledge, that would allow us to analyze the energy efficiency ratio (EER) of trucks in this vocation. We attempted to analyze the proposed concept chassis and drivetrains from several manufacturers based on their website data. Utilizing a CARB report of Battery Electric Truck and Bus Energy Efficiency.⁶ However, this analysis only elevates the uncertainty that the vehicles being offered will not serve the needs. We used average speeds and fuel consumption for our routes as a proxy and were able to completely rule out one of the offerings as unable to meet daily route distances, while the other might be adequate. That said, the PTO adds energy consumption that is unaccounted for and could skew the results significantly.

This rule ignores the necessary infrastructure that the fleets will rely on. Charging and hydrogen refueling come with significant equipment and labor costs that CARB will rely on slow and complex California Energy Commission (CEC) grants to offset. It is disappointing that CARB has opted to divorce this rule from the infrastructure requirements which far exceed the State's ability to fund and support at the scale and pace of the fleet deployment requirements in this rule.

Furthermore, the pace and scale of this rule's requirements will place tremendous costs on the residents of Roseville and our utilities. Broadly speaking policies adopted by CARB are supposed to be cost-effective however, the narrow construction of this rule and its exemptions create costs that are unnecessary to achieve the environmental outcomes. Additionally, due to the expansive and un-nuanced approach to the entire fleet, cost-effective investments made in compliance to the Short-lived Climate Pollutant (SCLP) Strategy regulations will be upside down. CARB should align its own goals and regulations to avoid this conflict prior to adoption of this regulation.

Conclusion

Roseville is pursuing a progressive, environmentally sound, and robust strategy to decarbonize our city. We want to ensure that policy does not overburden our residences and add to the mounting regulatory costs of California's rigorous goals. We look forward to continuing to work with the ARB on striking an appropriate balance to initiate the development of compliant vehicles while mitigating the costs to the residents and businesses we serve.

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: Board Members, California Air Resources Board
Steve Cliff, Executive Officer, ARB
Craig Segall, Deputy Executive Officer, ARB
Sydney Vergis, Chief, ARB
Tony Brasil, Branch Chief, ARB
Joe A. Gonsalves & Son
The Gualco Group, Inc.

⁶ <https://ww2.arb.ca.gov/sites/default/files/2018-11/180124hdbvefficiency.pdf>



City Council
311 Vernon Street
Roseville, California 95678

February 2, 2023

Mr. Tony Brasil
Deputy Executive Officer of Mobile Sources and Incentives
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Fleets – Waste Fleet Provisions

Dear Mr. Brasil:

On behalf of the City of Roseville (Roseville), I write to provide comments to the Air Resources Board regarding the Advanced Clean Fleets (ACF) Draft Regulation, specifically the provisions for public fleets and the cost assumptions.

Roseville is the largest city in Placer County with a population over 150,000 and 42.26 square miles of land. As a full-service city, Roseville provides essential utility and public services to its citizens, everything from public safety, electricity, water, wastewater, to solid waste management. These utilities serve just under 50,000 residences and businesses. This requires the city to maintain a large, diverse, and capable fleet. Roseville is committed to sustainability and can appreciate the task the California Air Resources Board (CARB) is trying to accomplish with this rulemaking.

The proposal as outlined at the December 12 workshop does not incentivize nor address the concerns of the City of Roseville. As presented, we believe the staff proposal perpetuates the inversion of the financing secured to divert organics from landfills while adversely affecting ratepayers due to the early retirement of RNG vehicles.

Core Issue

Municipal organic waste and wastewater byproducts will remain a part of our circular economy and should be used for the highest and best use. Methane is a significant climate pollutant that the California Legislature and CARB directed municipalities to invest in reductions. The activities taken to finance those projects depend on the use of biomethane as a transportation fuel. Agencies that took action and began planning to address short-lived climate pollutants after the passage of SB 605 Lara (Chapter 523, Statutes 2014), AB 1826 Chesbro (Chapter 727, Statutes of 2014), and SB 1383 Lara (Chapter 395, Statutes 2016) should be allowed to achieve full return on investment.

The state has pushed for a circular economy and Roseville is delivering on that undertaking. We remain concerned that CARB staff is not recognizing the significant scale or scope of the changes that were necessary to expand capacities to manage organics or the conversions necessary to allow them to accept food and other green wastes.¹

Shortly after the passage of SB 1383, in 2017, Roseville saw the opportunity to develop a “closed loop” with its waste stream. Through an investment of over \$30 million, Roseville is now leveraging our waste stream for a beneficial use that reduces our methane emissions and reduces our reliance on fossil fuels. Additionally, this project is a major contributor to our procurement requirements under 1383. As an early adopter, if the proposed regulation is adopted without a workable compliance the ACF will place Roseville in a Catch-22 between the two rules.

¹ https://www2.arb.ca.gov/sites/default/files/2022-12/221212acfpres_ADA.pdf Slide 9, second bullet states, “Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity.”

Questions and Answers

How to identify wastewater trucks within larger city/county fleets?

The vehicles we are concerned with are those that are up-fitted to accomplish our work and oftentimes have PTOs.

What records show we are implementing SLCP regulation?

The time in which we began planning for the project and all the steps through completion and implementation of the project and the fueling records. Also, record keeping showing the diversion of organics.

How are transfer trucks identified?

Roseville considers a transfer truck to be one that travels an hour or more and carries 22-24 tons. PTOs are on these trucks as well for operating the dropping/dumping.

Should provision sunset for plug-in hybrid CNG become available?

No, as this would require procurement of additional vehicles as opposed to investment in biomethane to hydrogen conversion. Additionally, we are unaware of any manufactures working on this technology and as some OEMs have stated at CARB meetings, the regulatory signal does not support the research and development necessary to bring these vehicles to market.

How to best avoid expansion of biomethane leading to stranded assets?

We believe this is myopic and does not address or acknowledge the need to meet statutory mandates and targets established in the SCLP regulation. CARB staff should not create this conflict between ACF and SLCP.

Path Forward

While we appreciate the comments at the Board hearing and opportunity to participate in the workgroups we believe additional changes are necessary to make this regulation workable without significantly impacting the rates on the residents of Roseville and throughout California. As proposed on December 12 the wastewater and refuse fleet provisions are not acceptable, as it would require the City to retire CNG trucks ahead of their useful life. The staff proposal removes flexibility of large fleets therefor disincentivizing any benefits that were perceived in designing the concept.

We propose, allowing Roseville and similar municipalities to remain under the provisions of the public fleet and convert on a percentage of purchase versus a fleet average under the same timeline as Group 3. This maintains fleet wide flexibility while allowing the wastewater/refuse fleet to fulfill Roseville's goals for a circular economy.

Additionally, Roseville supports both the written comments and the public comments made by the California Municipal Utilities Association and the California Association of Sanitation Agencies.

We appreciate the opportunity to provide these comments. The City of Roseville stands ready as a local example for CARB members and staff to coordinate follow up visits so we may demonstrate both our accomplishments to date and 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.

Sincerely,



Bruce Houdesheldt
Mayor, City of Roseville



City Council
311 Vernon Street
Roseville, California 95678

April 7, 2023

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

Re: Advanced Clean Fleets – Proposed 15-Day Changes to the Proposed Regulation Order State and Local Government Agency Fleet Requirements

Dear Dr. Cliff:

On behalf of the City of Roseville (Roseville), I write to provide comments to the California Air Resources Board (CARB) regarding the Advanced Clean Fleets (ACF) Proposed 15-day Changes to the Proposed Regulation Order, specifically the provisions for public fleets and the cost assumptions.

Roseville is the largest city in Placer County with a population of over 150,000 and 42.26 square miles of land. Roseville is unique in that we are a full-service city providing essential utility and public services to its citizens, everything from public safety, electricity, water, wastewater, to solid waste management. These utilities serve over 56,000 residences and businesses. This requires the city to maintain a large, diverse, and capable fleet. Roseville is committed to sustainability and has faithfully participated from the start of the regulatory process by submitting at least five comment letters, participated in each workshop and board meeting, and held over 14 meetings with CARB Board Members and staff to discuss our Waste-to-RNG (project description attached) project and the impact the rule would have on our ratepayers.

It was called out at the December 12, 2022, workshop, by CARB Board Member Gideon Kracov, that it was because of the concerns raised by Roseville that you held the workshop to address our niche issue. And as we submitted in our January 2023 comment letter, the proposed amendments did not address Roseville's concerns and we would not take advantage of the alternative pathway.

The release of the March 23, 2023, 15-day changes to the Regulation Order does not address the narrow relief requested, ignoring the concerns that the City of Roseville has expressed from the start. As proposed, the wastewater and refuse fleet provisions are not acceptable, as it would require the City to retire CNG trucks ahead of their useful life. The staff proposal removes flexibility of large fleets, therefore disincentivizing any benefits that were perceived in designing the concept.

Core Issue

In 2017, Roseville saw the opportunity to develop a "closed loop" with its waste stream. A confluence of legislation, 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), sent a strong signal that the most logical solution was to leverage our waste stream for a beneficial use that reduced our methane emissions and reduced our reliance on fossil fuels.

Capturing our wastewater treatment methane emissions will reduce consumption of over 250,000 gallons of diesel and be replaced with locally generated and controlled renewable natural gas. There is no reliance on pipelines or crediting to achieve this outcome, thus further lowering the carbon intensity of the fuel. Paired with low-NOx engines and the environmental outcomes on a lifecycle basis, we expect to exceed what can be expected from battery electric trucks charging during off-peak evening hours. Furthermore, this addresses the statutory requirements set forth, including organics procurement requirements established by SB 1383.

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 own low-carbon fuel standard pathways we know that the 2020 carbon intensity for off-peak (after 9pm) evening charging ranges from 112.14 gCO₂e/MJ to 79.35 gCO₂e/MJ and that the grid average between 9pm and 5am is 85.19 gCO₂e/MJ¹. Adjusted energy economy ratio (EER) values for battery medium duty application is 3.42 or ~25.06 gCO₂e/MJ. Provisional pathways in California for wastewater biosolids, like Roseville's project, results in a CI of 15.87 gCO₂e/MJ to 19.28 gCO₂e/MJ. Early investment by Roseville to deploy renewable natural gas (RNG) to our fleet provides a ~44.91% to 26.07% lower carbon intensity from the evening grid average today over a future vehicle that does not currently exist. Furthermore, we anticipate during drought years and with the stress of summer heat waves that caused the 2021 and 2022 load shedding events near-term evening grid, carbon intensity will continue to rise. This will further be exacerbated by the demand for charging created by this regulation.

CARB should not foreclose this environmentally sound compliance option at this time and instead should allow Roseville and other municipalities in control of their wastewater and solid waste streams to achieve compliance with this regulation and others required by statute.

As an early adopter, if the Board approves the ACF regulation it will place Roseville in a Catch-22 between the ACF and our obligations under the Short-lived Climate Pollutant Regulations adopted to implement SB 1383. We remain steadfast in our concern that CARB staff has not recognized or attempted to address our specific concerns or acknowledged the significant scale or scope of the changes that were necessary to expand capacities to manage organics or the conversions necessary to allow them to accept food and other green wastes.¹

Path Forward

After the last ACF workshop, we offered this narrow path forward via verbal and written communication "We propose, allowing Roseville and similar municipalities to remain under the provisions of the public fleet and convert on a percentage of purchase versus a fleet average under the same timeline as group 3." This maintains fleet wide flexibility while allowing the wastewater/refuse fleet to fulfill Roseville's goals for a circular economy. Roseville met with CARB staff to discuss this option and met yet another roadblock to a reasonable and narrowly crafted solution.

Lastly, as a member of the California Municipal Utilities Association and the California Association of Sanitation Agencies, Roseville supports both the written and the public comments made by our statewide trade associations. We appreciate the opportunity to provide these comments. The City of Roseville stands ready as a local example for CARB members and staff to coordinate follow up visits so we may demonstrate both our accomplishments to date and 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 Utility Government Relations Administrator at 916-297-2177 or ncmattock@roseville.ca.us.

Sincerely,



Bruce Houdesheldt
Mayor, City of Roseville

¹ https://www2.arb.ca.gov/sites/default/files/2022-12/221212acfpres_ADA.pdf Slide 9, second bullet states, "Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity."



City of Roseville Waste-to-RNG Facility



The City of Roseville, California, owns and operates two wastewater treatment plants (WWTP) on behalf of the South Placer Wastewater Authority (SPWA) and its partner agencies. The SPWA serves more than 250,000 residents in Placer County. The Energy Recovery Project (ERP) was installed at Roseville's Pleasant Grove WWTP (PGWWTP), which currently treats up to 10 million gallons of wastewater per day, protects local streams and rivers, and provides recycled water back to the community.

The PGWWTP needed to be expanded to accommodate future population growth in Roseville and the surrounding areas. In addition to increasing the treatment capacity, the plant expansion included anaerobic digesters to stabilize wastewater solids and generate a biosolids product that is suitable for beneficial use rather than landfilling as was the typical practice.

The City faced a unique opportunity: adding new anaerobic digesters to its PGWWTP at a time when regulations and grant funding opportunities were focused on driving organic waste toward such facilities while also incentivizing the use of digester gas for renewable energy and fuels. In the face of this opportunity, the City, on behalf of the SPWA, initiated a project to evaluate the best uses of its new source of digester gas and to capitalize on the new digestion process by co-digesting high-strength organic wastes. For this evaluation, the City chose to partner with Brown and Caldwell, an experienced environmental engineering firm with a specialty in municipal digester gas utilization projects. The result of this evaluation was the ERP – an ambitious and innovative renewable biofuels production facility.

The City's ERP conditions and upgrades digester gas generated in anaerobic digesters to produce vehicle fuel for Roseville's solid waste truck fleet. The system is comprised of several components:

High Strength Waste Receiving Facility

By accepting organic high strength waste streams directly into the plant's anaerobic digesters, this facility will be able to divert up to 5,000,000 gallons of organic waste per year in support of SB1383. This waste feedstock, in addition to municipal wastewater solids, will serve to increase digester gas production. Organics diverted from landfills will decrease fugitive emission of methane, a short-term climate pollutant, as well as provide a more local destination for trucked waste, which in turn reduces fossil fuel usage and criteria pollutant generation through shorter trips.

Biofuel Production

The ERP's biogas conditioning and upgrading facility has a production capacity of 267,000 diesel gallon equivalents (DGE) per year. By partnering with equipment supplier Unison Solutions, the project uses the BioCNG membrane separation technology to upgrade digester gas to vehicle fuel quality renewable natural gas (RNG). Unison also provided digester gas conditioning equipment to remove contaminants typically found in gas from a municipal anaerobic digester, such as hydrogen sulfide, siloxanes, and volatile organic compounds.

Cogeneration from Tail Gas

The process that separates carbon dioxide from methane in digester gas produces a rejected stream of gas – also called tail gas – that must be treated. Instead of flaring this gas as is typically done, the ERP system incorporates microturbine cogeneration units that utilize the tail gas as a fuel supply. These microturbines produce electricity to help power the gas upgrading equipment as well as heat for the anaerobic digester process. As part of the City's commitment to maximizing its beneficial use of biogas, this system pushes the boundaries of fully utilizing portions of biogas production that would otherwise be wasted.

Onsite Fueling of Solid Waste Truck Fleet

The City of Roseville's Refuse and Stormwater Division owns and operates a solid waste collections fleet for the Roseville community. In 2018, the City's Wastewater Division, which owns and operates the PGWWTP, negotiated a long-term fuel off-take agreement for all the RNG that will be produced as part of the ERP. The RNG is now delivered to the vehicles at a new onsite compressed natural gas (CNG) fueling facility that includes compressors, storage vessels, and fuel dispensers. In anticipation of facility's completion, the truck fleet is being converted from diesel fuel to CNG fuel. Switching from diesel fuel to renewable CNG is now reducing greenhouse gas emissions by approximately 3,655 metric tons of CO₂ equivalents per year and will reduce NO_x emission by 5 metric tons per year.

The ERP is producing some astounding financial and environmental benefits:

- Renewable fuel with a Carbon Intensity of 0 g CO₂e/MJ, based on consultation with the California Air Resources Board
- Grant Funding Cost Effectiveness per GHG Reduction of \$35/MTCO₂e reduced over a 30-year project lifetime
- Grant Funding Cost Effectiveness per DGE of \$0.48/DGE over a 30-year project lifetime
- Creation of 27 temporary construction jobs and 4 permanent full-time City staff
- 30-year production of over 6 million DGE of renewable biofuel

Roseville's ERP project supports the Governor's Executive Order goal for Carbon Neutrality by 2045 and our obligations under the Short-Lived Climate Pollutant Regulation established from the passage of SB 1383. As an early adopter, the City of Roseville, helped to lead the way forward by investing in this new application of gas upgrading technologies, an unfamiliar credit and incentive marketplace, and the uncertainty of being on the innovative edge in the municipal wastewater industry. By helping to support the City's ERP, the California Air Resources Board will not only support a worthy and well-conceived project that is improving the air quality of our community today, well ahead of the proposed ACF regulation. Furthermore, it will allow us to smooth out future rate increases that will be necessary to re-convert our entire refuse fleet to full electric.



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 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 gCO₂e/MJ to 79.35 gCO₂e/MJ, with the grid average between 9 pm and 5 am at 85.19 gCO₂e/MJ. Adjusted energy economy ratio (EER) values for battery-electric medium-duty applications yield approximately 25.06 gCO₂e/MJ. Provisional RNG pathways, such as Roseville's wastewater-biosolids project, result in a CI of 15.87 gCO₂e/MJ to 19.28 gCO₂e/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_x 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_x 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_x) 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_x 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.

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



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,

A handwritten signature in blue ink, appearing to read 'KB', is positioned above a horizontal line.

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