



City Council
311 Vernon Street
Roseville, California 95678

June 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 Second 15-Day Modifications to the Advanced Clean Fleets Regulation

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 Second 15-Day Modifications to the Advanced Clean Fleets (ACF) Regulation.

Roseville is the largest city in Placer County, serving approximately 160,000 residents and more than 9,000 businesses. As a full-service city, Roseville provides electric, water, wastewater, solid waste, public works, transit, parks, fire, police, and other essential municipal services. These services rely on a diverse fleet as well as a broad network of contracted service providers that support daily operations, emergency response, regulatory compliance, critical infrastructure delivery, and public safety.

Roseville has actively participated in the development and implementation of the ACF regulation since Governor Newsom issued Executive Order N-79-20 in 2020. Throughout this process, Roseville, along with public agencies and statewide associations, has consistently worked with CARB to identify practical implementation challenges and advance workable solutions that support the State's policy objectives while maintaining reliable essential public services.

While CARB has characterized the June 1, 2026 amendments as clarifications, Roseville is concerned that several of the proposed changes introduce significant new policy, implementation, procurement, and legal considerations that warrant additional review and stakeholder engagement.

Procedural Concerns Regarding the Second 15-Day Modifications

Roseville respectfully disagrees with CARB's characterization of the June 1, 2026 Second 15-Day Modifications as mere clarifications. The practical effect of the proposed changes is to expand the regulation's treatment of contracted vehicles and services, creating new compliance, procurement, reporting, and contractual considerations for public agencies and the contractors that support the delivery of essential public services.

In the Notice of Public Hearing, posted on July 29, 2025, CARB explained that the proposed amendments would repeal portions of the regulation applicable to private and federal fleets, stating that the proposal would "repeal parts of the ACF regulation...that would apply to federal or private

fleets”¹ and provide greater certainty regarding entities subject to ACF requirements. CARB's April 2026 First 15-Day Modifications continued implementation of AB 1594 and refinement of the State and Local Government Fleet provisions.² However, neither the original proposal nor the First 15-Day Modifications identified contracted services, franchise arrangements, consultants, vendors, or other third-party service providers as part of a public agency fleet for compliance purposes.

The Second 15-Day Modifications now revise multiple core provisions of the regulation by expanding fleet applicability, modifying the definitions of "Fleet Owner" and "Fleet," and requiring retention of agreements involving vehicles or services using vehicles.³ CARB states these revisions merely clarify existing requirements and remove ambiguity.⁴ However, if these requirements already existed, it is unclear why public agencies throughout California are now undertaking extensive reviews of contracts, franchise agreements, and service arrangements to determine which vehicles CARB intends to treat as part of a public agency fleet.

More importantly, the scope and practical effect of these amendments raise concerns regarding whether CARB is establishing new substantive compliance obligations through interpretation rather than clarification. If vehicles operated by contractors, franchisees, consultants, and other third-party service providers have historically been considered part of a public agency fleet, that interpretation was not clearly reflected in the regulatory text, supporting rulemaking documents, or stakeholder discussions leading to these amendments. To the extent the Second 15-Day Modifications establish compliance responsibilities, reporting obligations, or enforcement expectations that were not reasonably apparent from the existing regulation, they raise concerns regarding adequate notice, meaningful opportunity for stakeholder comment, and whether the proposed interpretation effectively functions as an underground regulation rather than a clarification of existing requirements.

This concern is particularly significant because CARB previously repealed the portions of the regulation applicable to private fleets. As a result, contractors that reasonably understood they were no longer subject to ACF requirements would have had little reason to continue participating in subsequent stages of the rulemaking process. Consequently, CARB may not have received comments from many of the private entities whose operations, fleets, and contractual relationships could now be affected by the proposed interpretation. Had this interpretation been identified earlier in the rulemaking process, affected contractors and public agencies could have provided meaningful information regarding procurement requirements, affordability impacts, infrastructure delivery, emergency response obligations, and the practical realities of providing essential public services.

Roseville is also concerned that the impacts associated with the expanded treatment of contracted vehicles and services do not appear to have been fully evaluated within the supporting rulemaking record. CARB's Economic Impacts Assessment relied upon vehicle population information derived from TRUCRS and public agency utility fleet data.⁵ It is unclear whether vehicles operated by private contractors performing services for public agencies were included in those assumptions or whether the costs associated with the proposed treatment of contracted vehicles and services were fully evaluated.

¹ California Air Resources Board, *Notice of Public Hearing to Consider Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations*, July 29, 2025, p. 4.

² California Air Resources Board, *Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information*, April 2, 2026.

³ California Air Resources Board, *Appendix A-2, The Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standards Regulations*, June 1, 2026, §§ 2013(a)(1), 2013(b), and 2013.4.

⁴ California Air Resources Board, *Second Notice of Public Availability of Modified Text and Availability of Additional Documents and Information*, June 1, 2026, p. 2.

⁵ California Air Resources Board, *Public Hearing to Consider Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standard Regulations, Staff Report: Initial Statement of Reasons, Economic Impacts Assessment, Vehicle Population Analysis*, August 1, 2025, p. 113 ("Staff utilized TRUCRS data which provides up to date information on vehicles actively operated by public agency utility fleets.").

Given these concerns, Roseville respectfully requests that CARB remove or defer the contracted fleet provisions from the Second 15-Day Modifications and provide additional opportunity for stakeholder review and comment before finalizing these provisions.

Contracted Fleets and Impacts to Essential Public Services

As a full-service city, Roseville relies on a diverse network of contracted service providers to support the delivery of essential public services.

The City is currently evaluating hundreds of active contracts, franchise arrangements, and service agreements that may be affected by CARB's proposed interpretation. These arrangements span every major City department and support the delivery of electric, water, wastewater, solid waste, public works, transportation, parks, fire, police, and general government services. **Attachment A** provides an illustrative list of service agreements, franchise arrangements, and contracted services currently under review to determine whether they may be affected by CARB's proposed interpretation.

The practical implications of CARB's proposed interpretation extend well beyond traditional public fleet operations. If vehicles used to perform contracted services are considered part of a public agency fleet for compliance purposes, the amendments may negatively affect, to the public's detriment, how local governments procure services, structure contracts, manage franchise arrangements, and deliver essential public services.

Many contractors providing essential public services do not work exclusively for a single public agency. Rather, they routinely provide services to multiple cities, counties, special districts, and other public and private entities using the same fleet of vehicles. If CARB intends vehicles operated by private contractors to be treated as part of a public agency fleet for compliance purposes, it is unclear how those vehicles would be accounted for, reported, or tracked when the same contractor performs services for multiple public agencies and private entities. ***The proposed amendments provide no guidance regarding whether the same privately owned vehicle could effectively be counted as part of multiple public agency fleets, how compliance responsibilities would be allocated, or how duplicative reporting and recordkeeping would be avoided.***

The Second 15-Day Modifications provide little guidance regarding how public agencies are expected to incorporate these vehicles operated by private contractors performing services on behalf of the City, as part of our fleet. ***CARB has not clarified which contractual relationships are affected, how public agencies are expected to evaluate contractor fleet compliance, what authority agencies would have to compel compliance, or how existing contractual obligations should be addressed.*** The following examples illustrate several common contractual relationships relied upon by Roseville to deliver essential public services and the practical questions raised by CARB's proposed interpretation.

Examples of Potentially Affected Contracted Services

Environmental Utility Services

Roseville relies on contracted service providers to support wastewater, water, recycled water, and solid waste operations, including services necessary to maintain regulatory compliance and protect public health and the environment.

Non-Exclusive Franchise Agreements

Roseville manages its own municipal solid waste collection service, meaning the City directly handles residential trash and green waste pickup as well as commercial trash and recycling. However, the City also authorizes multiple private entities to operate under non-exclusive franchise agreements for hauling services such as construction and demolition (C&D) debris removal and other specialized

waste-related services. Roseville currently maintains approximately 15 non-exclusive franchise agreements with private haulers operating within the City.

These franchisees own and operate their own vehicles and historically have not been considered part of a City fleet. Under CARB's proposed interpretation, however, it appears the vehicles operated pursuant to these franchise agreements would be considered part of Roseville's fleet for purposes of ACF compliance.

This raises a number of unanswered questions. How is Roseville expected to evaluate the fleet compliance status of franchise holders that are no longer required to report into TRUCRS? How would existing franchise agreements be treated, and what obligations would public agencies have to monitor or enforce compliance? Would Roseville be required to deny, terminate, or decline to renew a non-exclusive franchise agreement if the privately owned and operated franchise holder's fleet does not comply with ACF requirements? CARB has not provided any guidance regarding how public agencies are expected to address these issues.

Biosolids Hauling Services

Roseville relies on contracted biosolids hauling providers to transport biosolids generated through wastewater treatment operations for beneficial reuse and disposal. These services are necessary to maintain continuous wastewater treatment operations and comply with state and federal regulatory requirements. Additionally, these contractors routinely provide hauling services to multiple public agencies using the same fleet of vehicles, creating uncertainty regarding how compliance responsibilities would be allocated under CARB's proposed interpretation.

Laboratory Testing Services

Roseville contracts with specialized laboratories to perform drinking water, wastewater, recycled water, stormwater, and environmental testing necessary to comply with state and federal regulatory requirements.

Backflow Testing and Cross-Connection Control Services

Roseville relies on contracted service providers to perform required backflow testing, inspections, and related cross-connection control activities that help protect the public water system and support compliance with state drinking water requirements.

Electric Utility Services

Roseville relies on various contracted service providers that are essential to electric utility operations and support electric system reliability, wildfire mitigation, environmental compliance, infrastructure delivery, and emergency response activities. The number and diversity of contractors supporting Roseville Electric, including those servicing the City's power plant facilities, is extensive.

These contracted services include tree trimming, power plant maintenance and repair, electrical contracting, engineering support, civil construction, emissions monitoring and testing, stormwater inspections, crane services, equipment rentals, fuel delivery, industrial cleaning, and numerous other specialized services necessary to maintain reliable electric service and operate critical utility infrastructure.

Citywide and Public Safety Services

Roseville also relies on contracted services supporting fleet operations, public works activities, transportation infrastructure, parks maintenance, facility operations, emergency response, public safety, and other municipal functions.

Examples include fuel delivery and mobile repair services supporting City vehicles and equipment; construction management, surveying, materials testing, and civil construction services supporting public infrastructure projects; storm drain cleaning and CCTV inspection services supporting flood protection and regulatory compliance; telecommunications, technical support, and facility maintenance services supporting City operations; landscaping, tree maintenance, weed abatement, and goat grazing services supporting public spaces and fire risk reduction; and security-related and emergency response support services utilized during emergencies and disaster response activities. Many of these services also support the planning, construction, operation, and maintenance of public infrastructure necessary to accommodate housing, commercial development, and continued community growth.

This concern is particularly significant given California's ongoing housing crisis and the State's continued emphasis on accelerating housing production and infrastructure delivery. Roseville has been recognized by the State as a Prohousing Designated Jurisdiction and continues to invest in the public infrastructure necessary to support housing, economic development, and community growth. Many of the contracted services identified above directly support the planning, construction, operation, and maintenance of public infrastructure and essential community services. Any reduction in contractor availability, increase in compliance costs, or uncertainty regarding contractual relationships has the potential to delay infrastructure delivery, increase project costs, and affect the provision of reliable public services.

The proposed amendments raise significant questions regarding both existing and future contractual relationships. More fundamentally, the Second 15-Day Modifications appear to shift responsibility for addressing compliance issues associated with certain private fleets onto state and local government agencies. While CARB's proposed amendments repealed direct requirements applicable to private fleets and eliminated associated reporting obligations for many of those fleets, the Second 15-Day Modifications now raise questions regarding whether public agencies will be expected to evaluate, monitor, account for, or make contracting decisions based upon vehicles operated by private entities performing contracted services.

Public agencies do not possess regulatory authority over private fleets operating under franchise agreements, service agreements, or other contractual arrangements. Nor do public agencies have access to the compliance reporting information previously available through TRUCRS or the resources necessary to independently verify fleet compliance. ***CARB has not identified how public agencies are expected to fulfill these responsibilities, what authority agencies would possess to compel compliance, or whether additional funding will be provided to support these activities.***

By potentially treating vehicles operated by private service providers as part of a public agency fleet, the amendments effectively place local governments in the position of serving as the de facto regulator of private fleets while creating uncertainty regarding the continued availability, affordability, and administration of critical contracted services.

Roseville currently maintains numerous legally binding contracts and agreements that were executed prior to the release of these amendments. Unlike private entities, public agencies operate within statutory procurement requirements and frequently enter into multi-year contractual obligations. ***CARB has not explained how public agencies are expected to address existing contractual commitments if contracted vehicles are now considered part of a public agency's fleet for compliance purposes.***

The proposed amendments also create uncertainty regarding future procurements. CARB has not clarified whether public agencies will be expected to evaluate the fleet compliance status of every

contractor, consultant, vendor, franchisee, or service provider seeking to do business with the agency. ***Nor has CARB explained whether a public agency could be required to disqualify an otherwise qualified contractor if that contractor's fleet is not compliant with ACF requirements, despite the contractor not otherwise being directly subject to the regulation.***

These questions are not theoretical. Public agencies routinely contract for specialized services that are essential to maintaining public health, environmental compliance, utility reliability, emergency response, public safety, and critical infrastructure. Any reduction in the pool of qualified contractors, increase in compliance costs, or disruption to existing service agreements could have direct impacts on a public agency's ability to provide affordable and reliable essential services.

Affordability and Local Government Impacts

The proposed amendments also raise significant affordability concerns for local governments and the communities they serve.

Any additional compliance obligations imposed on contractors and service providers will ultimately be reflected in the cost of delivering essential public services. Increased contract costs are borne by utility ratepayers, taxpayers, businesses, and residents who depend upon reliable public infrastructure and services.

For a full-service city, the impacts extend well beyond utility operations. Contracted services support electric operations, public works, transportation infrastructure, emergency response, public safety functions, environmental compliance activities, and day-to-day municipal services relied upon by residents and businesses. Any reduction in contractor availability, increase in contracting costs, or uncertainty surrounding future procurements has the potential to affect the City's ability to provide reliable essential services to the community.

At the same time, local governments continue to face increasing obligations to address statewide priorities, including housing production, infrastructure investment, environmental compliance, climate resilience, and emergency preparedness. The Legislature has increasingly limited or constrained local funding mechanisms traditionally used to support growth-related infrastructure and public services, including impact fees, connection fees, and capacity charges. The cumulative effect of these policies is to increase costs while reducing local flexibility to recover those costs.

The practical effect of the proposed amendments is to shift additional regulatory and compliance burdens onto local governments at a time when agencies are already being asked to do more with fewer resources. Ultimately, these costs are borne by the residents, businesses, utility customers, and taxpayers who rely on local governments to provide essential public services.

Continued Failure to Address Longstanding Public Agency Concerns

While Roseville's comments focus primarily on the newly proposed treatment of contracted fleets, we remain concerned that the Second 15-Day Changes do not resolve many of the broader implementation challenges public agencies have consistently raised throughout this rulemaking process.

Roseville has actively participated in the ACF regulatory proceedings and discussions regarding implementation since 2021. Despite years of engagement, many of the fundamental concerns raised by Roseville and public agencies remain unresolved, including regulatory certainty, market readiness, affordability, operational flexibility, and the availability of workable compliance pathways for essential public service fleets. For example, Roseville has consistently raised concerns regarding the lack of a viable compliance pathway for renewable natural gas (RNG) produced through our Energy Recovery Project. Despite repeated engagement throughout the rulemaking process, discussions with CARB

staff, and direct engagement with Board Members, the regulation continues to limit Roseville's ability to utilize locally produced RNG to fuel essential service vehicles, despite the project's demonstrated environmental benefits and alignment with the State's circular economy and methane reduction objectives. The Second 15-Day Modifications introduce significant new concerns regarding contracted fleets while leaving many of these longstanding issues unresolved. For reference, **Attachment B** contains a compilation of Roseville's prior comment letters submitted throughout the ACF rulemaking process.

The latest amendments introduce significant new concerns regarding contracted fleets without resolving the underlying challenges public agencies have previously identified. While Roseville shares concerns regarding the June 1, 2026 amendments, simply reverting to the initial 15-Day package would not resolve the broader implementation challenges that public agencies have consistently raised throughout this process. Additional stakeholder engagement and regulatory refinement remain necessary to ensure public agencies can continue providing reliable essential services while pursuing the State's policy objectives.

Statewide Association Alignment

Roseville is actively engaged with the League of California Cities (CalCities), Association of California Water Agencies (ACWA), the California Association of Sanitation Agencies (CASA), the Northern California Power Agency (NCPA) and the California Municipal Utilities Association (CMUA). Roseville generally supports the comments and recommendations submitted by these organizations and appreciates their continued efforts to work collaboratively with CARB and public agencies to identify practical implementation solutions.

In Closing

Roseville remains committed to California's climate goals and to advancing practical, community-based solutions that reduce emissions while maintaining reliable essential public services. However, the proposed treatment of contracted fleets creates significant uncertainty regarding public agency compliance obligations, procurement practices, contractual relationships, affordability, and the continued delivery of essential public services.

Roseville respectfully requests that CARB reconsider these proposed changes and work collaboratively with public agencies and stakeholders to develop a clearer, more practical, and more workable path forward.

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

Attachment A: City of Roseville Contracted Services
Attachment B: City of Roseville ACF Comment Letters

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

Michelle Buffington, Chief, Transportation and Toxics Division, CARB
Tony Brasil, Chief, Freight Activity Branch, CARB
Paul Arneja, Manager, Advanced Clean Fleets Branch, CARB
Chris Franceschi, Manager, CARB

The Honorable Yana Garcia, Secretary California Environmental Protection Agency

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
Emily Lemei, Northern California Power Agency
Damon Conklin, League of California Cities
Justin Caporusso, Mountain Counties Water Resources Association