City of Roseville (Noelle Mattock)

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.

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[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

ATTACHMENT A - *CITY OF ROSEVILLE CONTRACTED SERVICE PROVIDERS*

The City of Roseville is currently evaluating active contracts, franchise arrangements, on-call agreements, purchase orders, and service agreements to determine whether they may be affected by CARB's proposed interpretation regarding contracted vehicles and services. These services support the delivery of essential public services throughout the City and demonstrate the broad range of contracted activities that may be implicated by the Second 15-Day Modifications. ***Note due to the compressed 15-day comment deadline this is just a <u>partial</u> list.***

ENVIRONMENTAL UTILITIES

Departmentwide Utility Services

The following contracted services support multiple Environmental Utilities functions and cannot be readily assigned to a single utility operation. These services support Water, Wastewater, Recycled Water, Solid Waste, and Stormwater operations across the Environmental Utilities Department.

- On-call engineering services - supporting regulatory compliance, Urban Water Management Plans, Water Shortage Contingency Plans, master planning, infrastructure reliability, capital project delivery, and long-term utility system planning
- On-call construction management and inspection services - supporting construction oversight, quality assurance, regulatory compliance, and delivery of critical infrastructure projects
- Design services - supporting utility infrastructure planning, modernization, system expansion, and capital improvements
- Design-build construction services - supporting delivery of critical utility infrastructure projects
- Surveying services - supporting utility design, construction, mapping, easement management, and asset management activities
- Technical consulting services - supporting operational, regulatory, environmental, financial, and infrastructure planning activities
- Construction management services - supporting utility capital improvement projects and infrastructure delivery
- Program-wide technical support services - supporting utility operations, maintenance, asset management, and regulatory compliance activities
- Operational technology and SCADA support services - supporting treatment operations, monitoring systems, communications infrastructure, cybersecurity, automation, and emergency response capabilities
- Information technology services - supporting utility systems, communications, data management, and operational technology
- Equipment rental services - supporting maintenance, construction, emergency response, and infrastructure repair activities
- Training services - supporting employee certification, safety, operational readiness, and regulatory compliance requirements

• Outreach and communication services - supporting customer engagement, regulatory requirements, public education, water conservation, and environmental stewardship programs

Wastewater and Recycled Water Services

• Biosolids hauling and disposal services - supporting wastewater treatment operations, permit compliance, and environmentally responsible management of treatment residuals
• Laboratory testing and analytical services - supporting wastewater discharge permits, recycled water requirements, environmental monitoring, permit compliance, and protection of public health and the environment
• Engineering and consulting services - supporting treatment plant operations, collection systems, recycled water systems, regulatory compliance, and infrastructure improvements
• Construction services - supporting maintenance, rehabilitation, expansion, and reliability of wastewater and recycled water infrastructure
• Electrical services - supporting treatment facilities, pumping systems, automation equipment, and critical infrastructure reliability
• Equipment repair and maintenance services - supporting operational reliability, permit compliance, and continuous treatment operations
• Predictive maintenance services - supporting asset management and prevention of equipment failures that could impact regulatory compliance or service reliability
• Maintenance and sampling services - supporting permit compliance, environmental monitoring, and operational performance
• Programming support services - supporting treatment processes, automation systems, SCADA systems, and operational technology
• Hazardous waste disposal services - supporting environmental compliance and safe facility operations
• Vehicle maintenance services - supporting field operations, inspections, emergency response, and utility reliability
• Fuel supply and delivery services - supporting utility operations and emergency preparedness
• Compliance support services - supporting wastewater discharge permits, recycled water requirements, biosolids management requirements, industrial pretreatment programs, air quality requirements, and state and federal regulatory obligations
• Data reporting services - supporting permit compliance, regulatory reporting, and operational monitoring requirements
• Technical testing and evaluation services - supporting treatment performance, operational reliability, and regulatory compliance

Water Utility Services

• Engineering services - supporting Urban Water Management Plans, Water Shortage Contingency Plans, drinking water regulatory compliance, hydraulic modeling, water supply reliability planning, infrastructure improvements, and long-term system management

• Construction services - supporting water treatment, transmission, storage, distribution, and reliability infrastructure
• Laboratory testing and analytical services - supporting compliance with state and federal drinking water standards, water quality monitoring, regulatory reporting, and protection of public health
• Backflow testing, inspection, and repair services - supporting state drinking water requirements, cross-connection control programs, protection of the public water system, and public health
• Inspection and repair services - supporting reliable delivery of safe drinking water and protection of critical infrastructure
• Equipment rental services - supporting maintenance, construction, emergency response, and infrastructure repairs
• Chemical supply services - supporting drinking water treatment, water quality standards, and regulatory compliance
• Fuel supply services - supporting utility operations and emergency preparedness
• Disposal services - supporting maintenance activities and environmental compliance
• Technical services - supporting water system operations, reliability, and infrastructure management
• Equipment, parts, and supplies - supporting operation and maintenance of water treatment, storage, pumping, and distribution facilities
• Landscape services - supporting maintenance of utility facilities and operational sites
• Fencing, security, and access control services - supporting facility security and protection of critical drinking water infrastructure

Stormwater Services
• Engineering services - supporting stormwater system planning, flood protection, and infrastructure improvements
• Compliance support services - supporting Municipal Separate Storm Sewer System (MS4) permit requirements, environmental monitoring, reporting, and regulatory compliance
• Inspection services - supporting system performance, permit compliance, and environmental protection
• Maintenance services - supporting drainage infrastructure, flood protection, and public safety
• Technical consulting services - supporting stormwater management, environmental compliance, water quality protection, and public outreach requirements

Solid Waste Services
• Chemical transport and disposal services - supporting environmental compliance and safe operations
• Water quality monitoring services - supporting regulatory compliance and environmental protection
• Landfill gas monitoring services - supporting environmental compliance, air quality requirements, and public health protection
• Repairs and maintenance services - supporting facility operations, equipment reliability, and service continuity

• Fuel supply services - supporting operational continuity and emergency preparedness
• Portable toilet services - supporting operational and field activities
• Fencing and security services - supporting site security and protection of public facilities
• Software, vehicle tracking, and information technology services - supporting operational management, compliance, reporting, and fleet coordination

Solid Waste Non-Exclusive Franchise Services
• Construction and demolition debris hauling services - supporting residential, commercial, and public infrastructure construction projects
• Waste transportation services - supporting lawful collection, transport, and disposal of materials generated within the City
• Recycling-related services - supporting waste diversion, recycling programs, and environmental compliance

ELECTRIC UTILITY
Electric Utility Operations and Reliability Services
• Tree trimming services - supporting electric reliability, public safety, emergency response, and protection of electric infrastructure
• Power plant maintenance and repair services - supporting electric generation reliability, operational readiness, and utility system resilience
• General electrical contracting services - supporting maintenance, repair, replacement, and construction of electric utility infrastructure
• Specialized engineering and technical support services - supporting electric system planning, operational reliability, infrastructure improvements, and technical analysis
• Civil design engineering services - supporting electric utility infrastructure planning, design, and capital improvement projects
• Civil construction services - supporting construction, rehabilitation, and replacement of electric utility infrastructure
• Owner's engineer services - supporting oversight, quality assurance, and delivery of major utility infrastructure projects
• Emissions monitoring and testing services - supporting environmental compliance and operation of electric generation facilities
• Waste hauling services - supporting utility operations, and environmental compliance requirements
• Stormwater inspection services - supporting environmental compliance, facility operations, and protection of utility infrastructure
• Equipment rental services - supporting maintenance activities, infrastructure projects
• Crane services - supporting maintenance, repair, and construction of electric utility infrastructure
• HVAC maintenance services - supporting operation of utility facilities and critical equipment reliability
• Pest management services - supporting maintenance of utility facilities and protection of critical infrastructure
• Scaffolding services - supporting maintenance, repair, inspection, and construction activities at utility facilities

• Fuel delivery services - supporting utility operations, emergency response, and backup power generation capabilities
• Industrial cleaning services - supporting maintenance of utility facilities, generation equipment, and operational reliability
• Large pump repair and maintenance services - supporting operation and reliability of critical utility infrastructure
• Chemical delivery services - supporting utility operations, environmental compliance, and facility maintenance activities
• FR uniform services - supporting employee safety and utility field operations
• Portable restroom services - supporting field operations, maintenance activities, construction projects
• Portable office services - supporting construction projects and field operations

FLEET SERVICES
• Fuel and consumable delivery services - supporting operation, maintenance, and readiness of City vehicles and equipment
• Tire supply and delivery services - supporting vehicle safety, fleet reliability, and continuity of operations
• Surplus equipment removal services - supporting fleet asset management, facility operations, and equipment replacement activities
• Hazardous waste collection services - supporting environmental compliance, employee safety, and proper disposal of regulated materials
• Mobile repair services for heavy-duty vehicles and equipment - supporting fleet reliability, emergency response, and continuity of essential public services
• On-site equipment installation services - supporting operation, maintenance, and deployment of fleet equipment and supporting infrastructure
• Fueling infrastructure repair services - supporting operation, reliability, and availability of fueling systems serving City vehicles and equipment
• Electrical infrastructure repair services - supporting operation, maintenance, and reliability of fleet facilities and supporting infrastructure

PUBLIC WORKS
Engineering and Infrastructure Services
• Heavy civil construction services - supporting construction, rehabilitation, and replacement of public infrastructure, transportation facilities, and utility improvements
• Construction management services - supporting oversight, quality assurance, regulatory compliance, and delivery of public infrastructure projects
• Materials testing services - supporting infrastructure quality control, construction standards, and public safety
• Surveying services - supporting infrastructure design, construction, mapping, right-of-way management, and capital improvement projects
• Environmental storm drain cleaning services - supporting flood protection, stormwater conveyance, water quality, and regulatory compliance
• CCTV inspection services - supporting assessment, maintenance, and rehabilitation of storm drainage and underground infrastructure systems

• Vegetation management services - supporting maintenance of public rights-of-way, infrastructure access, public safety, and operational reliability
• Tree removal services - supporting public safety, infrastructure protection, emergency response, and maintenance of public facilities
• Concrete cutting services - supporting utility repairs, infrastructure maintenance, and public improvement projects
• Asphalt milling services - supporting roadway rehabilitation, utility construction activities, and transportation infrastructure improvements

FACILITIES SERVICES
• Construction services - supporting maintenance, renovation, repair, and improvement of City facilities and public buildings
• Electrical services - supporting operation, maintenance, safety, and reliability of City facilities and supporting infrastructure
• HVAC services - supporting climate control, equipment operation, employee safety, and public access to City facilities
• Telecommunications services - supporting communications systems, operational connectivity, emergency response capabilities, and City operations
• Janitorial services - supporting public health, workplace safety, and operation of City facilities

PARKS AND RECREATION
• General construction services - supporting maintenance, repair, renovation, and improvement of parks, recreational facilities, and public amenities
• Electrical services - supporting operation, maintenance, safety, and reliability of parks infrastructure and recreational facilities
• Concrete services - supporting maintenance, repair, accessibility improvements, and construction of public facilities and amenities
• Landscape maintenance services - supporting maintenance, appearance, usability, and safety of parks and public open spaces
• Tree maintenance services - supporting public safety, protection of park infrastructure, and preservation of community assets
• Weed abatement services - supporting fire risk reduction, public safety, and maintenance of public spaces
• Goat grazing services - supporting vegetation management, fire fuel reduction, and maintenance of open space areas
• Plumbing services - supporting operation and maintenance of irrigation systems, restrooms, drinking fountains, splash pads, aquatic facilities, and other public recreational facilities
• Pest control services - supporting public health, facility maintenance, and protection of public assets
• Aquatics chemical delivery services - supporting operation of pools, splash pads, and other aquatic facilities, water quality management, and public health requirements
• Heating and air conditioning services - supporting operation, maintenance, and public use of recreational and community facilities

CITYWIDE SERVICES

• Uniform supply services - supporting employee safety, operational readiness, and delivery of essential public services across multiple City departments
• Advertising and outreach services - supporting public education, regulatory notifications, community engagement, and communication of City programs and services
• Security-related services - supporting protection of City facilities, public assets, employees, and members of the public
• Specialized consulting services - supporting strategic planning, regulatory compliance, technical analysis, organizational effectiveness, and delivery of public services
• Technical support services - supporting operation, maintenance, reliability, and continuity of City systems, technology, and business functions
• Emergency response support services - supporting emergency preparedness, incident response, disaster recovery, and continuity of essential public services

The City continues to evaluate additional contractual relationships that may be affected by CARB's proposed interpretation of contracted vehicles and services.

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/MJ[1]. Adjusted energy economy ratio (EER) values for battery medium duty application is 3.4[2] 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-NOx 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.

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[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

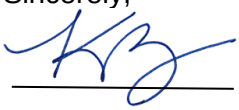
affordability issues facing many residents of this state. Utility cost increases have a disproportionate effect on low-to-middle income households. This instant rulemaking is not an isolated instance. Several other State-level regulatory proceedings at the State Water Resources Control Board, for instance,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



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 letter[2] 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 down[4] 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 comments[5] 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.

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[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 if 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.

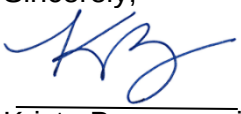
This rule ignores the necessary infrastructure that the fleets will rely on. Charging and hydrogen refueling come with significant equipment and labor costs that CARB will rely on slow and complex California Energy Commission (CEC) grants to offset. It is disappointing that CARB has opted to divorce 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
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The Gualco Group, Inc.

[6] https://ww2.arb.ca.gov/sites/default/files/2018-11/180124hdbevefficiency.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://ww2.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.

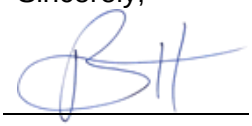
We propose, allowing Roseville and similar municipalities to remain under the provisions of the public fleet and convert on a percentage of purchase versus a fleet average under the same timeline as Group 3. This maintains fleet wide flexibility while allowing the wastewater/refuse fleet to fulfill Roseville's 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://ww2.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 NOx 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 establish 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 gCO_2e/MJ to 79.35 gCO_2e/MJ, with the grid average between 9 pm and 5 am at 85.19 gCO_2e/MJ. Adjusted energy economy ratio (EER) values for battery-electric medium-duty applications yield approximately 25.06 gCO_2e/MJ. Provisional RNG pathways, such as Roseville's wastewater-biosolids project, result in a CI of 15.87 gCO_2e/MJ to 19.28 gCO_2e/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,

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