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Submitted Via Electronic Commenting System

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**SUBJECT: RANCHO CALIFORNIA WATER DISTRICT COMMENTS ON THE
ADVANCED CLEAN FLEETS REGULATION, PROPOSED DRAFT
REGULATION LANGUAGE, PUBLIC FLEET REQUIREMENTS**

Messrs. Brasil, Duehring, and Ameja:

Rancho California Water District (Rancho Water/District) appreciates the opportunity to submit the following comments on the California Air Resources Control Board (CARB) Advanced Clean Fleet Regulation, Proposed Draft Regulations, Public Fleet Requirements and the September 9, 2021 Advance Clean Fleet Regulations public workshop.

Rancho Water is a special district formed in 1977. Rancho Water's service area includes the city of Temecula, portions of the city of Murrieta, and unincorporated areas of southwest Riverside County and encompasses about 100,000 acres. Rancho Water maintains and furnishes facilities for all water systems within the District, and for the collection and treatment of wastewater over the westerly portion. The service area elevation ranges from 1,200 to 2,900 feet above sea level, with slopes up to 28 percent.

Rancho Water continues to meet the ever-changing water needs of a growing and diverse community. The District, through the leadership of our Board of Directors, are ardent environmentalists. Conserving and managing the area's unique water resources are essential to the continued viability of the community.

As a recognized steward of the environment, Rancho Water has pioneered several projects to reduce emissions and carbon footprint, such as solar energy fields or ultra-efficient equipment. As an environmental leader and adopter of clean technologies, Rancho Water supports California and CARB's efforts to maintain and improve air quality and reduce impacts from climate change. The District has reviewed the proposed regulation, attended the September 9 and October 6, 2021 workshops, and offers the following concerns and comments:

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1. Diminished ability to respond to and support emergencies

Rancho Water responds to two types of emergencies: natural disasters and system failures. Both types of emergencies endanger life and property in different ways. Natural emergencies include firestorms, major earthquakes, and floods requiring us to deploy our staff to defend, repair, or restore our facilities in order to maintain water and sanitation services. A substantial earthquake or another flood could result in our staff and fleet being deployed for days without the ability to return to a refueling site, requiring remote fueling.

Examples:

- Murrieta Creek flooded. District forces could not return to headquarters for days, but had to operate the system to maintain water and sewer service.
- Annual fire season:
 - In the last five years, fires have become an annual occurrence for the District. Two years ago, staff was deployed, and vehicles were continuously running, to support CalFire utilizing Rancho Water's storage ponds as water supply for helicopters. During fires, District crews are not only providing water, but also driving portable generators to pump stations, and following fire crews to turn off water at houses that have burnt to save the supply for firefighting.
 - After the Paradise Fire, Rancho Water was able to provide relief by sending five crews with trucks, joining crews from throughout the state, repairing or replacing underground lines melted or contaminated by the fire. The crews helped rebuild the town in an area where electric power and fuel was not available. The District crews were there for two months.

If public agencies in California are not allowed exemptions for emergency vehicles, they will be required to ask for vehicles from other states. Those vehicles may need to stay substantially longer than the 30-day period allowed in Section 95693.5(c). The District recommends that any water or power vehicle that performs emergency response duties be exempted from the regulations until the technology develops that allows this type of fleet to function under fire or flood conditions for extended periods of time.

Emergencies generated by system failures include power outage (such as public safety power shutoffs, brownouts, or electrical equipment failures), water facility failures, and sewer spills. In order to provide sanitation, prevent contamination, and fire suppression capabilities within our system, the District must maintain a minimum system pressure. In order to do that, Rancho Water may deploy staff to operate portable generators at pump and lift stations, and quickly react to water line breaks.

Examples:

- Failure of a 24-inch line that took over 70 hours to repair. Flooding caused by this line failure caused numerous businesses and hotels to be without water.
- Rancho Water experiences one line break a week for a system average of five leaks per 100 miles of pipes per year. This puts a tremendous strain on District fleets, as they need to be deployed for days at a time. Rancho Water has four repair crews. There have been weekends where all four crews had to work 24-hour non-stop shifts to repair system emergencies to restore water services. During these emergencies, fleets do not come back to the base or are unable to leave the site to re-fuel.

Rancho Water must have reliable vehicles that can be fueled remotely and be able to go extended periods between fueling as a critical part of the District's emergency response.

Rancho Water would like to see CARB include utility vehicles in the emergency exemption listed in Section 95693 (c), until such time when zero-emission vehicle (ZEV) technology can consistently meet the requirement of our fleet, such as express remote charging (equivalent to current refueling times); express base charging; and range, not just in miles, but duration equivalent or exceeding today's emergency fleets capabilities. Requiring the use of vehicles that are substandard will endanger public health, safety, availability of drinking water, and sanitation.

2. Concerns with energy stability and infrastructure

For the day-to-day operations and emergency response, the District must have reliable energy sources. Rancho Water has substantial concerns with the stability of the electric grid, as demonstrated during the 2020 brownout and the California Energy Commission being on a constant lookout for more electricity. As a small fleet, at times, most of the District vehicles are deployed for system operations or emergencies. The District must have the ability to quickly fuel the fleet and have a stable energy source. The lack of charging infrastructure, more advanced battery technology, and stable energy sources is of tremendous concern.

The District has investigated rapid charging capabilities, and find them highly lacking. Remote charging the batteries is also a problem. Recently, California has suffered from heat waves that have cause brownouts through much of the state. The governor has issued executive orders that emergency generators may be operated to help relieve the crisis. Yet, with more electrification of vehicle fleets throughout the state, the times of power emergencies will be magnified, and there will not be enough emergency generators to fill in the gaps, further endangering our ability to provide sanitation and emergency response.

3. Concerns with vehicle availability and costs

In order to prepare for the upcoming implementation of the rule, Rancho Water initiated conversations with auto dealers and other electric vehicle developers. During the workshop on September 9, 2021, speakers discussed that there is a substantial availability of ZEV vehicles; however, the District is having problems finding them to evaluate and test their abilities.

Rancho Water's needs go beyond half-ton pickups. The District utilizes equivalents up to F-550 and a number of specialty vehicles, such as dump trucks, cranes, booms, long beds, vactors, and drill rigs. As discussed earlier, the District has not been able to even identify an F-150 ZEV equivalent to evaluate, let alone anything in the other sizes or specialty vehicles. Rancho Water is concerned that, as this rule is implemented, the technology nor the available production capacity will be there to allow the District to replace the vehicles in a timely manner without decreasing the ability to meet operational and emergency requirements.

The very short implementation requirements in the proposed rules are worrisome, as Rancho Water does not know that ZEV technology will be available to meet District needs from a timing and technology perspective. As a small fleet of under 100 vehicles, waiting two to three years for a replacement vehicle puts the District in a dangerous position of not being able to respond to operational and emergency events. Rancho Water is bound by Water Code Section 106.3 that statutorily recognizes that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes." This water code section is not just binding on public water providers, but on all entities to do all they can to maintain water that is affordable and accessible, including CARB. CARB needs to perform analysis how this rule will impact the affordability and accessibility of water.

Rancho Water would like the purchase requirements to be based on some minimum standards of availability and technical feasibility and level of available infrastructure. Rancho Water encourages CARB to form working groups to engage the utilities to determine what the best approach is to protect public health and safety.

If you should have any questions regarding the above, please contact Assistant General Manager-Engineering & Operations Eva Plajzer at the District office at (951) 296-6900 or plajzere@ranchowater.com.

Sincerely,

RANCHO CALIFORNIA WATER DISTRICT



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General Manager



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