



May 28, 2020

Via electronic submittal: <https://www.arb.ca.gov/lispub/comm/bclist.php>

California Air Resources Board
Clerk's Office
1011 I Street
Sacramento CA 95814

Subject: Comments on the 15-day draft of the Proposed Advanced Clean Trucks Regulation, Large Entity Reporting Requirement (Section 2012)

Dear Clerk of the Board:

The Eastern Municipal Water District (EMWD) appreciates the opportunity to provide comments on the California Air Resources Board (CARB's) 15-day draft of the Proposed Advanced Clean Truck Regulation (*proposed ACT*) revised May 1, 2020. As an affected entity, EMWD submits the following comments on the *proposed ACT*.

EMWD provides water, wastewater, and recycled water services to over 827,000 people in a service area of 555 square miles in Riverside County. EMWD owns and operates a mixed vehicle fleet to support the services we provide to our customers and sub-agencies. Our vehicles and equipment support our water and sewer infrastructure, and the supporting facilities we operate, including, but not limited to, water pumping plants, storage tanks, wells, desalter and water filtration facilities, regional water reclamation facilities, and sewer lift stations. We operate these facilities to fulfill our mission to "deliver value to our customers and the communities we serve by providing safe, reliable, economical and environmentally sustainable water, wastewater and recycled water services." As the provider of potable water, wastewater reclamation and recycled water services, EMWD is responsible for effectively managing its resources economically while being a good neighbor to the community. It is critical that we maintain a reliable fleet that we can utilize to promptly respond to outages, maintenance, and various repair needs at any of our facilities and infrastructure. The operational and

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2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300

T 951.928.3777 • F 951.928.6177 emwd.org

administrative vehicles are primarily housed at our treatment plants and headquarters building, which range from Moreno Valley to the north, Perris Valley to the west, Hemet/San Jacinto Valley to the east, and the Temecula Valley to the south. Our fleet is comprised of approximately 160 vehicles in classes 2b thru 8, which include combination sewage cleaning trucks, tankers, crane trucks, flatbed trucks, dump trucks, utility trucks, boom trucks, cement trucks, stake-bed trucks, water trucks, and bucket trucks, and vans.

EMWD's comments discussed in this letter address the updated Large Fleet Reporting requirements in Section 2012 of the most recent May 1, 2020 draft of the proposed ACT. It is our understanding that the information gathered from the fleet reporting requirements will be utilized by CARB and others to identify the zero-emission fleet market, and suitability for various industries. As a public agency, EMWD would be subject to the reporting requirements, and provide the following comments in effort to enhance the data collection to capture the unique characteristics of public agency fleets.

EMWD owns and operates a wide variety of trucks for maintenance and repair operations. These uses may not require long distance travel but can require the vehicles to operate multiple hours at a project site. A large percentage of these vehicles also operate auxiliary equipment (i.e. mounted compressors, welders, PTO equipment). The use of auxiliary equipment is not currently captured in the *proposed ACT Section 2012.2 (b)(2)*, however its inclusion will capture valuable information. As such, we suggest the inclusion of the following information in the reporting requirements-The percentage of vehicles in each weight bin that utilize auxiliary equipment (> 50 bhp), and the power requirements for the auxiliary equipment. In addition, in order to capture the unique operation of high usage vehicles, that is not captured solely using mileage, we suggest the inclusion of an optional measurement of usage category for each bin (i.e. hours/day or a percentage of time the equipment is used.)

Lastly, we also suggest some added flexibility in the definition for "Responsible Official" in the *proposed ACT*, section 2012 (d)(16)(C). The definition in the *proposed ACT* is limiting for public agencies. EMWD requests that the flexibility currently extended to corporations and partnerships, also be extended for public agencies. We suggest adding "or the delegate or designee of the aforementioned" after the listing of the principal executive officer for any municipality, state federal or other governmental agency. This would allow for submittal of the report and retention of the records to staff with direct knowledge over the program. This reduces review time and approval processes that become burdensome for public agencies when escalating the responsibility to such a high level, especially if they already have identified a designated responsible employee with working knowledge.

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Thank you for the opportunity to comment on the *proposed ACT*. We respectfully request that ARB consider our comments and recommendations prior to finalizing the official rulemaking draft. We appreciate your consideration and look forward to continuing to work with you on this significant regulation. If you have any questions or need additional information, please feel free to contact Alison Torres at (951) 928-3777 extension 6345 or at torresa@emwd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred Javier". The signature is fluid and cursive, with the first name "Alfred" being more prominent than the last name "Javier".

Alfred Javier

Director of Environmental and Regulatory Compliance

ARJ/AT: tlg

c: Doug Edwards, EMWD
Records Management, EMWD