



TUOLUMNE UTILITIES DISTRICT

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March 29, 2023

Clerk of the Board
California Air Resources Board (CARB)
1001 I St., 6th Floor
Sacramento, Ca 95814

Subject: Proposed Advanced Clean Fleets Regulation

Dear California Air Resources Board,

Tuolumne Utilities District (TUD) appreciates the opportunity to provide public comment to the California Air resources Board (CARB) in response to the proposed Advanced Clean Fleet Regulation. While TUD fully supports CARB's mandate to achieve zero emissions, we strongly feel that there should be an ability to allow exceptions in its implementation that assure the continuation of essential water and wastewater services, thereby protecting public health. As such, TUD respectfully requests that the Regulation not be adopted until these concerns are fully addressed.

TUD is a water and wastewater utility service provider to approximately 44,000 residents and businesses in Tuolumne County. We operate in the foothills of the Sierra Nevada Mountains at elevations between 2,000 ft. and 9,000 ft. with winter blizzards, atmospheric rivers, floods, mudslides, severe thunderstorms, and frequent power outages. Additionally, due to the impacts of multiple years of drought and other factors, Tuolumne County is listed as the number one County at risk of wildfire.

Water and wastewater utilities, like TUD, provide essential sanitation and public safety services. These systems operate continuously, and problematic conditions can occur at anytime and anywhere in our service area. Maintaining critical infrastructure and supporting public safety and emergency response in this terrain requires specialized fleets with off-road, 4x4 and custom bodies. When systems are damaged or need servicing, we must respond immediately with heavy-duty vehicles like vacuum trucks, water trucks, tractors, excavators, and a variety of other equipment needed to operate water and wastewater utilities plus support emergency response. In addition, TUD's fleet must have the capability to travel long distances and may remain in the field for many hours or days with remote fueling until the job is done.

As an essential service provider, TUD must have on-call employees ready to promptly report to water and wastewater emergencies 24/7. This requires on-call staff to take district vehicles home if such an emergency arises. These vehicles are also used during normal business hours and would not have sufficient time to charge to go back out in the field to respond to an after-hours emergency. To comply with this new mandate, the district would need to purchase an extra fleet of on-call vehicles which would be a significant financial hardship to the district and its ratepayers.

TUD appreciates the challenges that CARB faces in implementing the Draft Regulation, and we continue to support the goals of this effort. However, the current Draft Regulation does not address very serious concerns and efficiencies that are incompatible with our public service obligations. It is because of these concerns that TUD is respectfully opposing the Draft Regulatory Language on Public Fleet Requirements as written and recommend that the definition of “Emergency Vehicles” be expanded to include vehicles that directly support critical infrastructure for public health and safety purposes, including water and wastewater repair response vehicles. Should you have any questions about our position, please feel free to contact me.

Thank you for your consideration.

Sincerely, Don Perkins

General Manager