

John Bosler

Secretary/General Manager/CEO

October 20, 2020

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comment Letter - Comments on the California Air Resources Board (CARB) Amendments to the Proposed Advanced Clean Trucks Regulation

Dear Clerk of the Board,

The Cucamonga Valley Water District (CVWD) appreciates the opportunity to comment on the California Air Resource Board 15-day public period to add additional comments to the June 25, 2020 public hearing, in which the Board adopted a resolution to accelerate the widespread usage of zero-emissions vehicles (ZEN) in the medium and heavy-duty truck sector.

Cucamonga Valley Water District serves approximately 200,000 residents in its 47-square-mile-area that includes the City of Rancho Cucamonga, portions of the cities of Fontana, Ontario, and Upland, and some unincorporated areas of San Bernardino County. CVWD provides potable water supply, recycled water supply, and sewer collection services to its ratepayers. Providing high quality water and first-class customer service has been at the core of CVWD's mission since its establishment in 1955. As an owner/operator of a local government fleet tasked with supporting critical infrastructure to provide essential services to the public, the proposed amendments will directly impact the District.

Our vehicles and equipment, including medium and heavy-duty vehicles, support the operations and maintenance of the water and wastewater infrastructure which the communities we serve rely on. Because we manage critical infrastructure, we require a reliable fuel supply and sufficient range for our vehicles to support these essential operations. This includes a reliable and readily available fuel supply after a major disaster, such as an earthquake, to respond to emergencies or provide mutual assistance to others.

CVWD owns and operates a wide variety of trucks to perform maintenance and repair operations:

These operations may not require them to travel long distances, but often require the vehicles to operate multiple hours at a project site.

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. Therefore, in addition to collecting the vehicle miles, CVWD requests that the following additional information be collected:

- Percent of the total vehicles (e.g., in a weight class bin, or by vehicle body type) that have devices that run off of the engine to power equipment (e.g., PTOs); and
- Average hours of vehicle operation per day (may be broken into 8-hour shifts).

The Proposed Regulation Does Not Provide Sufficient Time to Collect Data: The Proposed Regulation mandates that regulated entities complete the reporting requirement by April 1, 2021 for the 2020 calendar year. While some of the information may be collected before the end of 2020, the data required pursuant to Section 2012.3 will require more time to collect and create additional workload for our staff in collecting, organizing, and providing this data. CVWD requests that the California Air Resource Board create outreach opportunities with agency fleet managers, to allow agencies to explain the diverse nature of their operations and the equipment requirements that their agency work requires, and to ensure that this data is accurately recorded for CARB.

The District requests that CARB update their analysis of the current and future manufacturer marketplace and sources of available funding for fleet agencies: It would be prudent for CARB to update its analysis of Zero Emission Vehicle (ZEV) models that will be available in the future at the critical milestone dates in the proposed Regulation. The District requests that CARB update their analysis of the current and future economic conditions that will affect availability of ZEV's and sources of available funding for government agencies to procure them.

The District requests that CARB allow Low Carbon Fuel Standard (LCFS) fuels to be counted as offsetting emissions: Government fleets have invested significant capital to purchase vehicles with an operational life cycle of 10+ years and install infrastructure to support alternative fuels that reduce emissions. This emission reduction effort should be credited.

The Cucamonga Valley Water District appreciates the opportunity to provide comments and looks forward to continued collaboration with CARB to adopt balanced & implementable regulations that support clean air while maintaining a reliable fleet that is able to perform critical operations to serve the public. If you have any questions or concerns regarding CVWD's comments, please contact Eric Grubb at 909-987-2591 or ericg@cvwdwater.com

Sincerely,



John Bosler

General Manager/CEO