

CALAVERAS COUNTY WATER DISTRICT

120 Toma Court • San Andreas, CA 95249 • Main Line (209) 754-3543

March 29th, 2023

Comment Letter Submitted via Electronic Commenting System

Directors
California Air Resources
Board
1001 I Street
Sacramento, CA 95814

RE: Low Population County Water District's Comments on the 15-day Language and Final Draft of the Advanced Clean Fleets Regulation.

The Calaveras County Water District (CCWD) has reviewed the 15-day language for the Final Draft of the California Air Resources Board's (CARB) Advanced Clean Fleets Regulation (Regulation). The District appreciates and supports the CARBs focused and concerted effort to implement Zero Emission Vehicles (ZEVs) in California and spur their innovation.

The Regulation, however, fails, among other things, to acknowledge constraints experienced by rural/mountain county water purveyors that highlight the common fact that water purveyors are first responders and therefore should be exempt from the rule. Moreover, required compliance reduces water purveyor's ability to respond effectively to water emergencies, and as a result, diminishes their ability to effectively ensure public health and safety.

CCWD worked to coordinate a tour of its multiple water systems in March of 2023 for the CARB Board to provide a greater understanding of this fact, unfortunately, no Directors were able to attend.

CCWD operates six public water systems across the entirety of Calaveras County. The systems range in elevation from approximately 500ft. to 6,000ft. These systems are in the Wildland Urban Interface (WUI) and in rural disadvantaged communities (DACs) short on resources. CCWD prides itself on its ability to provide a safe, healthy, wholesome, and reliable water supply to these communities.

Wildfires/wildfire risk (Butte Fire 2015 and Electra Fire 2022) and on-going grid reliability issues (Atmospheric River declared disasters, Public Safety Power Shutoffs or PSPS) continue to affirm the District's role as first responders in the Community.

CCWD played a critical role in working to ensure the continued supply of water to the communities of Sheep Ranch and West Point (DAC) during the Butte fire. This work required district Staff to operate behind the fire line alongside Cal-FIRE and others doing the good work to protect private property and put the fire out.

Firefighters deployed to combat a wildfire are often from out of the area. Working with staff from the local water utility in-situ can prove critical to their success and effectiveness. Water

district staff can direct fire crews to the nearest fire hydrants, tanks, raw water reservoirs, and operate the associated equipment to fill their trucks as quickly as possible. Staff work to identify cross-country water lines and can plan and deploy fire connections as necessary to optimize and improve the firefighting effort.

Fire supply and protection within the WUI is a critical consideration in the design and operation of a rural public water supply. It is always front of mind for CCWD and its customers. During the Electra Fire, CCWD had a seat at the table (alongside CHP, Cal-Fire, State OES, and others) of Calaveras County's Office of Emergency Services (OES) Emergency Operations Center (EOC) and worked to understand, provide and accounting of, and coordinate resources to resolve any unmet needs of other water purveyors in the path of the fire.

Of the District's six water systems, four are either entirely severely disadvantaged (MHI equal to or less than \$43,737), disadvantaged (MHI equal to or less than \$56,782), or a portion of one or both. Residents often don't leave their homes/homesteads for weeks or months. This fact impresses the importance of a safe, reliable, and wholesome supply of water. CCWD field Staff work very hard operate and maintain these rural, mountain water systems. Their efforts ensure the district's mission to *"Protect, enhance, and develop Calaveras County's water resources and watersheds to provide safe, reliable, and cost-effective services to our communities"*. Water main breaks and system failures are not routine operation to prevent public health risks, they are emergencies and CCWD addresses them as such.

Staff are On-Call every hour of the day every day of the year. Crews deploy at all hours to respond quickly and resolve emergencies and restore the district's public water systems to normal operation as quickly and efficiently as possible. When not addressed effectively, water system emergencies can devolve into public health and safety disasters very fast. A poor family who live a ½-mile down a dirt road and miles out of town have less access to an alternative supply of water than do their city counterparts. The tools and equipment necessary to restore the water supply can be more robust and heavy-duty than their urban counterparts as well.

These facts highlight the critical importance of effective water supply operation, maintenance, and emergency repair for CCWD.

CCWD operates and maintains more than 60 standby generators County-wide to work to ensure the continued supply of safe potable water and efficient removal of sewage continues without issue during power outages. Atmospheric River Storms wreak havoc on the rural communities in Calaveras County. Power is often out for days while crews work to remove downed and broken trees, broken power poles, reset power lines, and restore power. All the while District Staff are re-fueling generators to keep facilities operating effectively and to keep people in supply of water. This effort can encompass the entirety of Calaveras County during a PSPS event (2019). District Staff can find themselves responsible for the refueling of all stationary standby generators while also working to transport and connect trailer-mounted generators to locations where a stationary generator may have failed.

As illustrated by both Federal and State storm related disaster declarations over the years, these efforts are emergency efforts. Having effective tools to get the job done are critically important to the successful resolution of any emergency.

Comparable applicable ZEVs (such as VacCons) to be used to complete emergency repairs of water systems like CCWDs do not exist. ZEV pickup trucks lose the necessary towing and carrying capacity and thereby their effectiveness when it comes to emergency water system repair. When you add four-wheel drive (all CCWD service vehicles are required to be four-wheel drive) to a ZEV pickup requirement, they don't exist either. These are tools

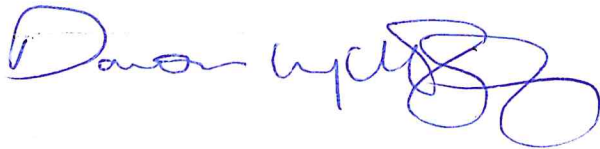
CCWD uses on a daily basis and during emergencies to ensure the continued reliable supply of safe water to the communities of Calaveras County.

Access to a reliable, safe, and wholesome water supply is a human right in California (AB 685, Sept. 2012). Requiring public water systems to implement tools that don't exist in the emergency repair of water systems conflicts with that human right. Requiring the use of deficient tools in the emergency repair of public water systems needlessly exposes disadvantaged groups to health risks.

It is clear this is not the intent of the CARB as police, fire and emergency medical services are exempt from the rule even though applicable ZEVs do exist for their efforts.

CCWD respectfully requests that the CARB acknowledge California Water Purveyors are first responders as illustrated by its described efforts and designate them as such to make them exempt from the Advanced Clean Fleets Regulation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Damon Wyckoff", with a stylized, looping flourish at the end.

Damon Wyckoff, Director of Operations