



April 6, 2023

Submitted via:

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

The Honorable Liane M. Randolph
Chair, California Air Resources Board
c/o Clerks' Office
1001 I Street
Sacramento, CA 95814

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SUBJECT: Advanced Clean Fleet Regulation

Dear Chair Randolph:

Rancho California Water District (Rancho Water/District), a water, wastewater, and recycled water provider in southwest Riverside County, would like to thank you for the opportunity to submit public comments on the Advanced Clean Fleet (ACF) Regulation Modified Text. Rancho Water has significant health and safety concerns about implementing these regulations as currently written and including the Modified Texts, and we believe these regulations will have significant impacts on the ability to provide water service continuity to vital sectors including hospitals and schools during times of emergency, and will result in negative impacts to utility customers throughout California, with specific concern placed on the effects to minority and disadvantaged communities. Rancho Water's terrain, like much of California, is a high-fire-prone-area, and without access to adequate vehicles capable of maneuvering rural and rugged roads, communities in our service area will be placed in jeopardy due to premature investment in unproven vehicle technologies.

Rancho Water's comments below are detailed by section to align with the Modified Text, where feasible; however, the District also aligns our comments with those from the California Municipal Utilities Association (CMUA) and the Association of California Water Agencies (ACWA).

I. Vehicle Scope and Availability

In 2022, Rancho Water initiated its Electrification Master Plan, designed to serve as a roadmap for deploying electric vehicles, charging stations, and related support infrastructure to fully deploy the District's electric fleet in accordance with forthcoming State regulations. Coinciding with this effort, Rancho Water's purchasing team commenced ordering six ZEV half-ton trucks and initiated the installation of six on-site charging stations. These early investments were intended to support compliance towards achieving the State's ambitious Advanced Clean Fleet Regulations. However, our purchasing team was informed that the requested six half-ton pickups were unavailable. The manufacturers have since shut down the

waitlist; thus, only one reservation for a light-duty ZEV truck has been completed to date as manufacturers struggle with equipment supply chain issues, production and design constraints for the vehicles. Meanwhile, it has been publicly demonstrated that the towing ability of some of these trucks cut the range of the vehicles by 30-60 percent, depending on the weight of the equipment towed.

Rancho Water has experienced similar challenges with heavy-duty trucks, where it has been communicated to the District that these vehicles are not available. As a result of the shortages in vehicle specifications from major manufacturers, lack of physical vehicles for delivery, and inability to provide estimates on delivery timeframes, Rancho Water is unable to complete the development of our Electrification Master Plan. Rancho Water District fleet personnel have reviewed the chassis, cab, and cutaway vehicles shown in the CARB documentation; however, it has been determined that the vehicles that are currently being made cannot meet our needs and lack the necessary towing capacity and range. Initial inspection of the bus chassis held early promise; however, manufacturers have informed staff that they are not rated for towing and could not, therefore, specify the Gross Combination Weight Rating (GCWR) for the vehicles. Some manufacturers have shared that these vehicles could traverse maximum grades of 10-20 percent, however, many of our water storage reservoirs and access roads in our District exceed those limits, placing District staff and customers at risk.

II. Exemptions for Unavailable Vehicles

The District appreciates that the regulation has exemptions for unavailable vehicle types; however, the details of these regulations make the exemptions almost impossible to utilize. For the daily usage exemption, our construction crews don't have set routes like transit agencies do, and even our water quality routes vary from day to day. The requirement to take the lowest mileage rating for each vehicle in the weight class does not align with the functions of the tasks that water and wastewater agencies perform.

By way of an example, every pipe break is an emergency for those homes and industries affected; these instances are not routine business. We have to fix every single one, not just the ones within the average range. Failure to fix a pipe break or sewage spill can mean contamination of the water supply leading to a public health crisis within the communities we serve. We must uphold this public trust. As for mutual aid vehicles, we cannot buy vehicles that only go an average range while ignoring the smaller percentage of events that have long drives, up steep inclines, or are on the above-average section of the mileage bell curve. Workable solutions to these exemptions were submitted previously for consideration by the Association of California Water Agencies (ACWA) and the California Municipal Utilities Association (CMUA) over the last couple of years, however, these solutions have yet to be fully incorporated in the revised regulations.

As noted previously, Rancho Water had been working on an Electrification Master Plan, and staff was forced to postpone further progress due to insufficient vehicle specifications. It is challenging to plan for electrification when there are insufficient standards mandated by the State on types of chargers, amperages, and voltage needs, and manufacturers haven't released charging



specifications for vehicles that have yet to be designed. Furthermore, Southern California Edison, the District's electrical utility provider, has informed the District that they are overloaded with orders and can't estimate our power needs for over a year – thus leaving a critical infrastructure agency, in a vulnerable position when it comes to addressing the mandate of the State and providing a core service to our communities. The investments necessary to accommodate the electrification of our fleet vehicles are too costly and in short supply to guess wrong, and yet utilities, including water and wastewater agencies are not being equipped with the necessary information, specifications, and exemptions to ensure the successful deployment of these regulations. As such, Rancho Water suggests that Section 2013.1 (c)(1) be written more broadly to account for progress towards meeting the goal, not just limited to when a contract and permits are in place, to account for the deficiencies that are outside of the control of the public agency.

Rancho Water prides itself on being a forward-thinking water provider. We strive to achieve the state's goals and mandates, however, implementing the Advanced Clean Fleet Regulation, including the Modified Text, as developed, places the health and well-being of our customers and many other of the state's residents in jeopardy. The District urges the California Air Resources Board to consider the additional changes proposed by ACWA, CMUA, and SCAPA to make this a workable regulation. Additionally, Rancho Water also supports the request by the Metropolitan Water District of Southern California (MWD) to allow the Rule to have the flexibility to extend the 50 percent buying limits until 2030 for those classes of vehicles that are not commercially available.

If you should have any questions or concerns regarding this correspondence, please contact me at (951) 296-6909 or by email at granthamr@ranchowater.com.

Sincerely,

RANCHO CALIFORNIA WATER DISTRICT



Robert S. Grantham
General Manager

Cc: Board Members, California Air Resources Board
The Honorable Eduardo Garcia, 36th Assembly District
The Honorable Kate Sanchez, 71st Assembly District
The Honorable Kelly Seyarto, 32nd Senate District

