



VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

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Re: Valley Center Municipal Water District's Comments on Draft Regulatory Language for the Advanced Clean Fleets Regulation Public Fleet Requirements

Valley Center Municipal Water District has been an active participant in the water / wastewater community's statewide and regional workgroups; developing input and letters of comment on the Draft Regulatory Language for the Advanced Clean Fleets Regulation Fleets Requirement. As such, we fully support the comments contained in the September 27, 2021 letter of comment, jointly submitted by the Association of California Water Agencies (ACWA), Rancho Water, Imperial Irrigation District, Turlock Irrigation District, and San Juan Water District; as well as the October 4, 2021 San Diego County Water Authority and Member Agency joint letter.

Rather than provide comments similar to those contained in the previously referenced letters, VCMWD would like to concentrate its comments on pointing out the inherent Public Safety nature of water and wastewater agencies. Further, we want to raise our concern as to how Draft ACF Regulations may interfere with these entities meeting their essential public health and safety responsibilities. To that end, we would like to point out the following:

- **Water and Wastewater Agencies have been formally defined as Public Safety Partners by the CPUC** – In the recent Public Safety Power Shutoff Proceedings, the CPUC officially recognized water and wastewater agencies as **Public Safety Partners** because of the inherent role these entities play in maintaining public health and safety. As the CARB moves forward to develop and ultimately adopt the Advanced Clean Fleets regulation, it should come to understand and recognize, as did the CPUC, this critical aspect of water and wastewater agencies' responsibility. Often water and wastewater agencies function to sustain and restore critical services as well as assist first responders in emergency and disaster-related conditions.

- **Water / wastewater agencies can only fulfill their role as Public Safety Partners if their fleet is ready to respond immediately and often for extended periods** - If their vehicle fleet cannot make an initial response due to the lack of grid power in the increasing frequency of PSPS Event, Rolling Blackout or Fire and/or is unable to sustain response over 12-18-24 hours, then water and wastewater agencies will be severely compromised in the ability to restore critical services to their customers, communities and provide assistance to first responders in emergency situations.

Recommendation: With these two points in mind, CARB should consider a blanket exemption for water and wastewater agencies to ensure their ability to make initial and sustained responses over extended periods, at all times, and under all conditions. This could be a permanent exemption or even an interim exemption in effect until there is consensus that the development of the ZEVs in terms of market availability and vehicle performance has progressed to the point where ZEVs will not limit nor diminish the emergency response capabilities of these agencies. An interim exemption could also allow time for greater distribution of off-home-site charging stations and the much-needed power grid enhancement which will be needed to meet the expanding electricity needs as California moves to 100% Carbon-Free Energy and 100% ZEVs.

Finally, CARB could consider a permanent or interim exemption of portions of water / wastewater fleets; which are identified as being Critical Emergency Response Vehicles (CERVs), including but not limited to specialty crew trucks (8500 + GVWR), dump trucks, boom trucks, water trucks, and transport trucks to deliver backhoes, excavators and other types of large equipment.

In conclusion, we would ask that CARB recognize the inherent Public Safety nature of water and wastewater agencies in developing the final ACF Regulation. Promulgating regulations that could hamper the speed and/or duration of response during critical emergencies will expose communities to diminished levels of public health and safety; something that neither CARB nor any water/wastewater agency would want to see happen.

Sincerely;



Gary Arant
General Manager