

John Bosler
Secretary/General Manager/CEO

August 18, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: ZEV Forward Public Dialogue Sessions-Public Comment

To whom it may concern,

The Cucamonga Valley Water District (CVWD) 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.

CVWD appreciates the opportunity to provide comment on the proposed Advanced Clean Fleet (ACF) regulation. Vehicle fleets of our size (CVWD owns 56 vehicles regulated by ACF) have very little redundancy or backup in terms of fleet inventory; all vehicles are assigned to particular purposes, duties, and/or personnel. In the event of an emergency, the duty cycle of each vehicle must be near 100% as emergency response activities are conducted 24 hours/day, seven days a week until the emergency situation has been remedied. Traditional ICE vehicles have duty cycles well as in excess of 90% in that they can operate continuously with the exception of refueling. The current ZEV technology has a severely limited duty cycle and requires hours for recharging/refueling. Additionally, the range of current ZEV technology, along with the lack of a reliable network of charging infrastructure, severely constrains the ability to provide mutual aid to other agencies.

After the recent Eaton fire in Alta Dena, CVWD provided emergency water quality monitoring personnel to help an affected agency restore water service to its community; current ZEV technology would have severely impacted CVWD's ability to respond and support the recovery efforts. Last, and perhaps most critical, is the cost to ratepayers, the current ACF implementation timeline is causing significant financial burdens to all affected agencies (cost of current ZEV Class 2B vehicles is 200%+ of its ICE counterpart, not to mention charging infrastructure). Every agency is struggling with aging water and wastewater infrastructure, which competes for the limited funds to support capital infrastructure replacement.

CVWD supports good environmental stewardship; however, respectfully urges careful consideration of the proposal and the impact it will have on public agencies and our ratepayers and our ability to respond during emergency events.

Sincerely,



Randall James Reed
President, Board of Directors