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September 15, 2025

Dr. Steve Cliff, Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Western Water Comments on the 45-Day Package (Proposed Amendments) to the Advanced Clean Fleets Regulations and Low Carbon Fuel Standard**

Dear Dr. Cliff,

Western Municipal Water District (Western Water) appreciates the opportunity to comment on the 45-day package proposed amendments to the Advanced Clean Fleets (ACF) Regulations (specifically, Section 2013, State and Local Government Agency Fleet Requirements) and the anticipated topics in the upcoming 15-Day package.

Western Water is one of the largest public agencies in Riverside County, providing water, wastewater, and recycled water services to nearly 1 million people, both wholesale and retail customers, across 527 square miles in western Riverside County. Western Water directly provides water to approximately 25,000 residential and business connections within portions of Murrieta and Riverside and the unincorporated communities of El Sobrante, Eagle Valley, Lake Mathews, portions of Mead Valley, and March Air Reserve Base.

Our primary concern with the Advanced Clean Fleets regulations has been the ability for public agencies like Western Water to respond to increasingly frequent extreme events that require ever-increasing levels of emergency preparedness and response, such as public safety power shutoff events. This is why Western Water is requesting the regulation to provide early access to exemptions that are critical to supporting reliable fleets today and position fleets to leverage renewable natural gas (RNG) fueled vehicles to achieve both emissions reductions and community resilience.

**Western Water's Comments Specific to CARB's 45-Day Regulatory Package**

Western Water's comments on CARB's proposed amendments to the ACF regulations as part of the 45-day regulatory package are focused on:

- The modified definition of the near-zero emission vehicle (NZEV).
- The new definition of the Traditional Utility-Specialized Vehicle.
- The new Section 2013.1(g) Traditional Utility-Specialized Vehicle Early Access which provides two pathways for granting public agencies early access to the Daily Usage and Zero-Emission Vehicle (ZEV) Purchase Exemptions to maintain reliable essential public services.
- Streamlined ZEV Purchase Exemption List.



## Modified Near-Zero Emission Vehicle (NZEV) Definition

The original definition of NZEV references a “vehicle” as defined in title 13, CCR, section 1963(c), which requires the vehicle to achieve a minimum number of miles, or “all-electric range”, as specified in [title 13, CCR, section 1963.2\(b\)\(2\)](#), which equals or exceeds the criteria specified in title 17 CCR section 95663(d) until the end of the 2029 model year and an all-electric range that equals or exceeds 75 miles or greater starting with the 2030 model year. The definition continues to reference the Advanced Clean Truck Regulation (which is in litigation) and needs further modification to provide additional flexibility to public agencies due to the projected absence of ZEV options capable of meeting daily operational needs to ensure compliance and reliable essential public services while achieving emission reductions.

The current definition of an NZEV is copied below and includes CASA’s recommended modifications underlined for ease of reference and CARB’s consideration.

[“Near-zero-emission vehicle”](#) or “NZEV” means one of the following:

- (A) An on-road plug-in hybrid electric vehicle which has the same definition as that in 40 CFR section [86.1803-01](#), amended on July 1, 2011, incorporated by reference herein, that achieves all-electric range as defined in section [1963\(c\)](#); or
- (B) An on-road hybrid electric vehicle that has the capability to charge the battery from an off-vehicle conductive or inductive electric source and achieves all-electric range as defined in section [1963\(c\)](#); or
- (C) An on-road low NOx vehicle fueled by biomethane (or RNG) fuel.

Western Water’s recommended modification (to add option “(C)”) is strongly supported by the University of California Riverside’s latest summary of heavy-duty vehicle emissions (June 2025) in two ways – 1) the study shows RNG as a negative carbon intensity fuel capable of low NOx emissions and 2) the study shows transitioning to ultralow NOx vehicles between 2025 and 2040 could achieve a 95% reduction in NOx emissions, with a transition to ZEVs only showing an additional 5% reduction.

## New Definition: Traditional Utility-Specialized Vehicle

Western Water generally supports the proposed definition for a Traditional Utility-Specialized Vehicle, which is...

“an ICE vehicle owned and operated by a public agency utility that meets all the following criteria:

- (A) Has a GVWR >10,000 lbs;
- (B) Has a body configuration that is not designed to primarily carry cargo or passengers;
- (C) Has maximum limits for tongue weight, axle loading, and a gross combination weight rating;
- (D) Is operated >50 percent of the time to maintain reliable public utility services as defined in Section 224.3 of the Public Utilities Code, Section 116275 of the Health and Safety Code, Section 20200 of the Water Code, and Section 116773.2 of the Health and Safety Code; and
- (E) Is either:
  - 1. Equipped with a power take-off device that draws power directly from the engine or transmission, or
  - 2. Equipped with four-wheel drive or six-wheel drive capable of providing torque and power to all wheels simultaneously.”

Western Water supports the California of Sanitation Agencies' (CASA's) previous proposals that this definition includes Class 2B vehicles, since those vehicles are also required to maintain reliable systems. **Western Water requests that CARB consider the following specific examples of Class 2B vehicles that are critical to sewer maintenance and preventive care to avoid blocked lines and sewage backups for which there are no ZEV options available:**

- CCTV vehicles can be Class 2B vehicles that often see low mileage and higher power demand while conducting essential inspection work of sewers to identify required maintenance or to respond to emergency overflows or blockages. The higher power demand is related to launching motorized cameras; powering video equipment on the mobile camera; running lights, video equipment, air conditioning, as well as heating or cooling for operators within the vehicle; and powering lights outside the vehicle.
- Vehicles towing a trailer that operate for an extended period of time and in extreme weather conditions. Examples of equipment commonly towed in the water/wastewater sector:
  - Vacuum combo trailer.
  - Emergency generator (to power a pump station).
  - Emergency bypass pump(s).
  - Emergency response trailers with confined space entry and rescue/safety equipment, pipeline repair equipment, excavation shoring safety equipment or spill control and containment supplies (sandbags).
- Service truck with crane.
- Traffic control truck (typically 10,000 lbs GVWR)

Additionally, CARB listed examples of Class 3 through 8 vehicle types. **Western Water requests including the following wastewater fleet vehicle types as examples – valve truck, service truck with crane, traffic control truck, combination vacuum-jetter truck.**

### **New Section: 2013.1(g) Traditional Utility-Specialized Vehicle Early Access**

While Western Water supports the addition of the new section 2013.1(g), pathway 1 is largely ineffective, as many of our members have traditional utility-specialized vehicles that will not reach the mileage or hour threshold before they reach 13 years of age (the current requirement). That said, pathway 2 is essential and provides a public agency early access to the Daily Usage and the ZEV Purchase Exemptions, assuming the traditional utility-specialized vehicle being considered for replacement is included in a vehicle replacement plan that establishes vehicle age, vehicle miles traveled, or engine hours as criteria for replacement prior to using or requesting the exemption. During the workshop held October 3rd, 2024, CARB acknowledged that each public agency has a unique approach (and criteria) to their vehicle replacement. Vehicle replacement plans are compiled by public agencies in an effort to estimate the timing and cost of vehicle replacement to ensure responsible investments of ratepayer funds. **Western Water strongly supports the inclusion of Pathway 2.**

### **Updating the Streamlined ZEV Purchase Exemption List**

Regarding the development of the [Streamlined ZEV Purchase Exemption List](#) of vehicle configurations only available as internal combustion engines that CARB originally posted January 1, 2025, and most recently updated March 20, 2025, CASA fully supports the formation of this list and greatly appreciates the inclusion of the Class 8 vacuum truck. However, public agencies frequently use Classes 4 through 7 vacuum trucks as well (images of Classes 4 and 7 provided below), which are not available as ZEV. Classes 4 and 5 are frequently used for skid-mounted vacuum units (combined with jetter) and also

include pipeline inspection units. The Class 6 truck is used for the non-commercial driver's license (CDL) combo machines, hydro-excavation units, and jettors which are 3- to 5-yard debris bodies. The Class 7 truck is used when 5- to 10-yard debris bodies are needed. **Western Water requests that Classes 4 through 7 vacuum trucks, as well as Classes 4 through 8 combination vacuum-jetter and jetter trucks be included on the list.**

We are committed to working collaboratively with CARB executives and staff to address the critical need for further modifying the NZEV definition to provide flexibility for public agencies. This is essential for maintaining reliable and resilient public agency systems and communities. We will continue to prioritize resilient essential public service operations to protect public health and the environment.

If you have any questions, please contact Western Water's Environmental and Regulatory Compliance Manager, Lyndy Lewis, at [llewis@wmwd.com](mailto:llewis@wmwd.com) or 951.571.7288.

Respectfully,



CRAIG D. MILLER, P.E.  
General Manager

Submitted via: [ZEVFleet@arb.ca.gov](mailto:ZEVFleet@arb.ca.gov) and [CARB's Public Comment Portal](#)

Cc: Liane Randolph – CARB Board Chair  
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