Cucamonga Valley Water District (Eric Grubb)

My name is Eric Grubb, I am the Government Affairs Manager for the Cucamonga Valley Water District.

I'd like to thank Chair Randolph and the Board for the opportunity to provide comment on this important item.

CVWD is supportive of the resolution offered by CARB staff today with the understanding that CARB will extend the current purchase requirements on state and local fleets to 2030 and continue working on additional changes to balance the goals of ACF with real-world needs of public water agencies. We are members of ACWA and CSDA and support their comments.

CVWD operates 56 regulated vehicles with very little redundancy or backup. 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 is over. Current zero-emission vehicles have limited range and long recharge times, making them unsuitable for 24/7 response, jeopardizing public health and safety.

After the Eaton Fire, we provided mutual aid to restore safe and reliable water to those impacted communities. The limited duty cycle and extended recharging time of ZEV's, along with the lack of a reliable network of charging infrastructure, would severely constrain the ability to provide mutual aid.

ZEV costs are up to over 200% of their traditional counterparts, with significant infrastructure expenses falling on ratepayers. We are committed to good environmental stewardship. However, that commitment must be balanced with our responsibility to protect public health, maintain dependable service, and affordable rates.

We respectfully request a five-year delay in ACF implementation for public agency heavy-duty vehicle fleets. This time is needed for vehicle technology development, infrastructure investment, and a realistic assessment of commercial viability.

Thank you