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### ESTABLISHED AS A PUBLIC AGENCY IN 1952

WEST VALLEY WATER DISTRICT'S MISSION IS TO PROVIDE  
OUR CUSTOMERS WITH SAFE, HIGH QUALITY AND RELIABLE  
WATER SERVICE AT A REASONABLE RATE AND IN A  
SUSTAINABLE MANNER.

## ADMINISTRATION

**John Thiel**  
*General Manager*

**Linda Jadeski**  
*Assistant General Manager*

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*Chief Financial Officer*

**Elvia Dominguez**  
*Board Secretary*

September 15, 2025

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

### **Subject: Comments on Draft Regulations Implementing Assembly Bill 1594 – Advanced Clean Fleets**

To whom it may concern,

The West Valley Water District (WVWD) appreciates the opportunity to provide comment on the proposed Advanced Clean Fleets (ACF) regulation. WVWD is a special district governed by a five-member Board of Directors, providing high-quality, potable retail water service to approximately 101,530 customers across portions of Rialto, Colton, Fontana, Bloomington, unincorporated areas of San Bernardino County, and part of Jurupa Valley in Riverside County. Our mission is rooted in providing high quality, reliable water while accommodating our growing community and aging infrastructure.

WVWD owns and operates a fleet of 76 vehicles, including 64 medium and heavy-duty utility trucks regulated by the ACF, and 10 emergency response vehicles. As a public water agency, WVWD has very little redundancy in its fleet. Each vehicle is assigned to specific duties—such as On-Call response, Valve Truck operations, Yard Dump Truck use, Backhoes, Vactor Truck deployment, Welding, and Water Quality Sampling. These vehicles are essential to ensuring safe, reliable water service to more than 100,000 residents, and they play a critical role in response to emergencies.

Our trucks are routinely dispatched for water emergencies and mutual aid, operating 10–12 hours per day and covering over 125 miles daily. In these situations, the duty cycle for each vehicle must be near 100%, often requiring continuous operation until the emergency is resolved. Current ZEV technology, however, does not yet provide the operational range, rapid refueling/recharging capability, or charging infrastructure necessary to support these extended emergency operations. Traditional ICE (Internal Combustion Engine) vehicles can meet these demands, while ZEVs would face downtime and logistical constraints that could hinder emergency response.

Cost is another significant concern. The current ACF implementation timeline poses financial challenges for public water agencies. The cost of ZEV Class 2B and larger vehicles remains more than double that of their ICE counterparts, not including the additional expense of installing and maintaining charging infrastructure. These costs directly compete with the already pressing need to replace and upgrade aging water infrastructure, which is critical to maintaining public health and safety.

WVWD supports the state's long-term climate and air quality goals. However, we respectfully request that the California Air Resources Board (CARB) consider the unique operational and emergency response requirements of public water agencies, as well as the significant financial impact on our ratepayers.



Thank you for your consideration of these comments. WVWD looks forward to continued collaboration with CARB on achieving shared environmental and public service goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Thiel", enclosed within a large, loopy blue oval.

John Thiel, General Manager