

Las Virgenes Municipal Water District (David Pedersen)



Dedicated to Providing High-Quality,
Reliable Water Service in a
Cost- Effective and Environmentally
Sensitive Manner

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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

June 16th, 2025 | Submitted electronically

Liane Randolph, Chair
California Air Resources Board
10001 I Street,
Sacramento, CA, 95814

RE: Advanced Clean Fleets--Rented or leased vehicle proposed amendments / 15 Day Comment

Dear Chair Randolph,

The Las Virgenes Municipal Water District (LVMWD) is located in the western part of Los Angeles County and encompasses large areas that are high fire hazard zones. We have been hit by two of the ten most destructive fires in California's history, the Woolsey Fire and the Palisades Fire. The basic point we wish to make is that exempting "emergency vehicles" is inadequate. We need exemptions for vehicles that perform critical roles in an emergency; not just the ones painted bright colors with flashing lights.

While we appreciate the steps the California Air Resources Board (CARB) is taking to address concerns over the unintended consequences of the Advanced Clean Fleets (ACF) regulations, all previously expressed concerns from numerous parties related to the lack of availability of reliable zero emission vehicles (ZEVs) apply with equal force to the proposed amendments on rented and leased vehicles. If reliable ZEVs are not available for purchase, it stands to reason that they are also not available for us to rent or lease.

To give one example, a standard medium-duty truck that serves typical functions under normal conditions, will be pressed into service during a wildfire to tow fuel tanks to portable generators running critical water pumps that support fire suppression. Those generators are critical because the electrical grid will be offline under Public Safety Power Shutoff rules. Further demands on the vehicle result from having to operate in rugged terrain and remain on duty for days at a time. We have conducted significant research trying to identify ZEVs that can reliably operate under these conditions to no avail.

LVMWD is committed to clean energy; we were one of the first public utilities to build a solar power infrastructure to offset our carbon footprint. We currently generate 5 megawatts from of 6-acre solar farm, which is sufficient to run our large water reclamation facility. We question whether any public agency is more committed to protecting our air and water than LVMWD. If there was a way to use more ZEVs in our fleet, we would find it.

In addressing rented and leased vehicles in the proposed amendments, we again ask that CARB expand the exemptions available to emergency vehicles to include vehicles that will reasonably be used under emergency conditions. If our concerns could be addressed by simply renting or leasing a reliable ZEV, we would have no need to submit this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Pedersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Pedersen
Las Virgenes Municipal Water District
General Manager