



August 30, 2024

Mr. Tony Brasil  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: CASA Responses to CARB Staff Questions Related to Incorporating AB 1594 Requirements into the Advanced Clean Fleets Regulations**

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

Dear Mr. Brasil:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide additional input on how to incorporate the requirements of Assembly Bill 1594 (AB 1594) into the Advanced Clean Fleets (ACF) Regulations. CASA is an association of local agencies performing essential public services – collection and treatment of wastewater – to protect public health and the environment while advancing community resilience through the recycling and recovery of resources (water, biogas, biosolids, nutrients, etc.). Through these efforts we help create a clean and sustainable environment for Californians.

Our members are also focused on supporting the state achieve carbon neutrality by 2045:

- Reducing short-lived climate pollutant (SLCP) emissions by accepting and co-digesting diverted organic (food) waste from landfills pursuant to SB 1383
- Reducing carbon intensity of transportation fuel by beneficially using the biogas we generate
- Providing 100 percent of the state's energy needs from clean and renewable sources
- Increasing soil carbon and carbon sequestration by land applying biosolids and supporting the Healthy Soil Program, Climate Smart Strategy, and Wildfire and Forest Resilience Action Plan

With federal and state regulations requiring higher levels of maintenance across public sewer systems and the increasing frequency of extreme events, we have ever-increasing demands on our fleet vehicles. To ensure our member's critical services remain reliable and in compliance with water quality, air quality, solid waste, and energy-related regulations, the wastewater sector must have the ability to perform preventive measures in all circumstances.

To provide the flexibility the wastewater sector and other public agencies need to remain responsive and resilient, CASA supported the development and approval of AB 1594, which authorizes... *"public agency utilities to purchase replacements for traditional utility-specialized vehicles that are at the end of life...when needed to maintain reliable service and respond to major foreseeable events, including severe weather, wildfires, natural disasters, and physical attacks, without regard to the model year of the vehicle being replaced."*

CASA submitted written comments May 20, 2024, in response to CARB's request for specific feedback during and following the March 25<sup>th</sup> workshop regarding how to incorporate AB 1594 requirements into the ACF regulations. CASA then met with CARB staff virtually June 26<sup>th</sup> to provide clarifications and address a second set of questions. We have documented our responses to the second set of questions in the bullets that follow.

1. Regarding the proposed definition of traditional utility-specialized vehicle:
  - a. How was your definition chosen? What vehicles are not included in the definition?

The proposed definition ([40 CFR 403.3\(q\)](#)) was agreed upon during a discussion with CASA members to address concerns that the current definition ([Section 116773.2 of the HSC](#)) lacked clarity. Additionally, CARB already references the proposed definition in its [Statewide Portable Equipment Registration Program \(PERP\)](#). All our members' medium and heavy-duty fleet vehicles serve a critical role in maintaining a reliable collection system, treatment system, recycled water system, resource recovery system, as well as support the disposal / beneficial use of recovered resources, and we therefore recommend they all be included in the definition.
  - b. Which trucks require towing capability and how much? Are vehicles with towing differentiated versus those which are not?

Most wastewater-related medium- and heavy-duty fleet vehicles are either already equipped to tow or are capable of adding towing capacity as needed. Towing is routinely needed and decreases the range (distance) that can be traveled. Generally, we expect ¾ - ton trucks and larger to be equipped to tow from the manufacturer, with the remaining medium- and heavy-duty fleet vehicles being capable of adding towing capacity in order to respond to emergencies (or to prevent an emergency) as needed.
  - c. Some common vehicle types have been identified as utility-specialized vehicles including service body crew trucks and step vans. What is the rationale to include these?

We request that all Classes (2B-8) of medium- to heavy-duty vehicles be defined as a traditional utility-specialized vehicle since all fleet vehicles within these Classes play mission critical roles in maintaining reliable essential public services and supporting emergency response (including those designated for Mutual Aid uses). Specifically, we requested in our May 20<sup>th</sup> comments that *"traditional utility-specialized vehicles" be defined as all chassis and equipment within the Class 2B-8 weight range capable of driving off-highway and on low traction surfaces, and/or have a vocational power system (power take-off) or auxiliary power.*
2. Follow-up on how to determine end-of-life without using model year. CARB cannot use a long list of potential criteria to define a regulatory provision.
  - a. Are end-of-life procedures formalized anywhere (e.g., board-approved procedure, planned purchases or replacements per year w/ VINs, other public document, written policy, etc.)? Are these procedures specific to vehicle body types/configurations? See response to question 2b.
  - b. Do you have purchase plans that identify vehicles and their expected replacement dates?

Municipal wastewater treatment plants manage their vehicles just as they manage their treatment facility assets – they track the vehicle year, model, type, miles, operational hours, and general reliability of the vehicle to perform its actions. There are no sector-wide standard policies or procedures, but members document the expected remaining life of their vehicles relative to their time out-of-service, as well as the cost of keeping them in service. Based on this information, members develop general timelines for replacing their vehicles (for budgeting purposes) but may have to replace a vehicle at any time to achieve their objective, which is to maintain compliant and reliable essential public services, as well as be ready to immediately respond to emergencies or for their prevention. Since wastewater sector medium- and heavy-duty fleet vehicles MUST be operable and ready at all times for foreseen and unforeseen events, as soon as a vehicle is deemed unreliable or potentially unreliable it must be replaced. This does not allow our sector to have "firm" schedules for replacements.
3. For the Daily Usage Exemption, instead of using the lowest mileage readings, what form of mileage reading is appropriate? Mean or median?

The legislation states, *"For the purposes of determining the daily usage of a medium- or heavy-duty vehicle, a public agency utility may provide comprehensive usage data for a class of vehicles that*

*does not exclusively rely on the lowest mileage reading and does not exclude the highest usage days.”* The highest usage days serve as the basis for wastewater sector fleet planning and preparedness for emergency response and for providing services to avoid an emergency. If available ZEVs cannot provide that level of service or they exceed the weight limits of access roads, then the sector needs to be able to consider other types of vehicles capable of protecting public health and the environment in all circumstances.

- a. What types of usage data do you collect from your trucks and what data collection systems do you utilize? Can you provide examples of data?

Members track vehicle year, model, type, miles, operational hours, and general reliability of the vehicle to perform its actions (i.e., the expected remaining life of their vehicles relative to their time out-of-service).

We are committed to working collaboratively with you to incorporate the requirements of AB 1594 into the ACF regulations, which are critical for maintaining reliable and resilient wastewater treatment systems and communities. We will continue to prioritize resilient essential public service operations to protect public health and the environment.

Please contact me with any questions at [sdeslauriers@casaweb.org](mailto:sdeslauriers@casaweb.org) or at 925-705-6404.

Sincerely,



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cc: Liane Randolph – Chair, CARB Board  
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