



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

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CLERK OF THE BOARD
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June 13, 2025

VIA EMAIL AT ZEVFLEET@ARB.CA.GOV

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Fleet-Specific Challenges and Support for Flexibility in ACF Compliance

Dear Chair Randolph,

The Coachella Valley Water District (CVWD), which serves approximately 300,000 residents across more than 1,000 square miles of the Coachella Valley, appreciates the California Air Resources Board's (CARB) continued efforts to advance zero-emission transportation through the Advanced Clean Fleets (ACF) regulation. We also thank CARB for engaging public agency utilities like CVWD as you consider amendments under AB 1594 (Garcia, 2023).

As a water agency with critical public service responsibilities and emergency response obligations, CVWD has been working proactively to plan for ACF compliance. However, we are encountering real-world operational and logistical challenges that we believe must be addressed through increased flexibility in the regulation. **Lives and property are at risk when fleet limitations delay our emergency response.**

CVWD Fleet Compliance Planning

CVWD has initiated the development of a comprehensive fleet compliance plan to align with the Advanced Clean Fleets regulation. Our efforts to date include:

- Since 2019, CVWD has proactively transitioned away from diesel vehicles by replacing them with gasoline-powered alternatives and eliminating six diesel units entirely. Fleet downsizing has also been prioritized and accelerated in response to ACF. For example, we are replacing twenty-eight 19,000 Gross Vehicle Weight Rating (GVWR) trucks with smaller 6,800 GVWR vehicles. Additionally, in December 2023, CVWD deployed 25 battery electric vehicles, replacing 30 gas powered ½ and ¾ ton pickup trucks, as part of a mitigation plan with the South Coast Air Quality Management District.
- In support of electrification, CVWD installed 26 electric vehicle charging stations, which became operational in January 2024.

- In January 2025, CVWD completed a comprehensive zero-emission fleet study evaluating both hydrogen fuel cell and battery-electric vehicle options. The study identified hydrogen as a more practical long-term solution due to faster refueling and extended range capability. However, implementation is contingent on infrastructure development, which is currently pending Board approval for funding and scope.

Exemptions Needed

Given the operational realities of our service area, including extreme heat, remote locations, and the need for reliable emergency response, CVWD anticipates the need to pursue exemptions under the ACF regulations in the following areas:

- Heavy-duty fleet composition: A primary area of concern involves vehicles rated at 19,000 GVWR and above. This segment includes 139 utility bed trucks, many of which are equipped with specialized features such as liftgates, cranes, and other essential equipment used for emergency repairs and critical maintenance. CVWD operates 44 heavy-duty vehicles that are 34,000 through 64,000 GVWR, including dump trucks, heavy haul tractors, water trucks and large cranes, equipment for which zero-emission alternatives are currently limited or unavailable.
- Previous Exemption Requests: CVWD has previously secured exemptions through the South Coast Air Quality Management District (SCAQMD). In 2014, two Targeted Incentive Clean Replacement (TICR) approvals were granted for Vactor trucks. Further, in October 2021, we received seven additional TICR approvals. These exemptions required the retirement of diesel vehicles in favor of gasoline-powered replacements and supported the deployment of 25 battery-electric vehicles placed into service in December 2023.
- Emerging Technologies- Near-zero emissions: CVWD encourages CARB to consider exemptions for near-zero-emission technologies, including hydrogen internal combustion engines and other emerging hybrid configurations. These technologies offer promising alternatives for applications where full electrification is currently infeasible due to duty cycle, range, or infrastructure limitations.

Key Challenges

We respectfully highlight the following barriers to ACF compliance:

- Extreme heat operational needs: Due to Cal/OSHA Heat Illness Prevention laws and routine summer temperatures exceeding 110 degrees, CVWD field employees must often run vehicle air conditioning in the field. The risk of zero-emission vehicle (ZEV) battery depletion during field operations or emergencies could jeopardize worker safety.
- Emergency response limitations: CVWD regularly responds to emergencies such as floods, high winds, and potential earthquakes. These events often require vehicles to operate for extended periods in remote areas without access to charging infrastructure. As such, every vehicle in our fleet must remain available for extended emergency deployment.

- Lack of ZEV options: many of our medium and heavy-duty specialty vehicles lack commercially available ZEV alternatives that meet our performance needs.
- Cost and procurement delays: The cost of suitable ZEVs, combined with long procurement lead times, poses significant budgetary and planning challenges.
- Time and Cost Commitment: Developing the necessary charging and fueling infrastructure requires significant investment, long lead times, and coordination across multiple departments and jurisdictions. Securing funding, permitting, and contractor availability can delay project timelines and impact our ability to meet regulatory milestones.

Forecasted Compliance Issues

Based on our current planning, we anticipate the next 3–5 years will be particularly challenging for compliance, primarily due to the configuration and range requirements of our fleet vehicles over 8,500 GVWR, which, as noted, are specialized in nature.

Fleet technologies are still evolving and emerging, with many ZEV options produced by startups rather than established manufacturers. When these companies fail, as seen with Nikola Corporation's bankruptcy February 2025, public agencies are left without parts, service, or support. This creates unexpected compliance risk and delays. Replacing unsupported vehicles can take 3-5 years, making planning and compliance with ACF highly uncertain.

In summary, CVWD support CARB's overall clean fleet goals and are committed to advancing electrification where feasible. However, we urge CARB to adopt workable flexibilities, especially for agencies like CVWD that must maintain essential services and operate in high-risk, high-heat, and geographically complex environments.

We look forward to working collaboratively with CARB through the AB 1594 process and appreciate your continued engagement. If you have any questions or need additional information about our fleet, please contact Karen Borja at kborja@cvwd.org.

Sincerely,



J. M. Barrett
General Manager