

1 WENDY Y. WANG, Bar No. 228923
wendy.wang@bbklaw.com
2 ANYA KWAN, Bar No. 333854
anya.kwan@bbklaw.com
3 BEST BEST & KRIEGER LLP
300 South Grand Avenue
4 25th Floor
Los Angeles, California 90071
5 Telephone: (213) 617-8100
Facsimile: (213) 617-7480
6

Attorneys for Respondent
7 WESTERN MUNICIPAL WATER DISTRICT

8
9 BEFORE THE HEARING BOARD OF THE
10 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

11 In the Matter of
12 SOUTH COAST AIR QUALITY
13 MANAGEMENT DISTRICT,
14 Petitioner,
15 v.
16 WESTERN MUNICIPAL WATER
DISTRICT
17 [Facility ID No. 163418],
18 Respondent.

Case No. 6240-1

**DECLARATION OF CHRIS FIKE IN
SUPPORT OF STIPULATION RE
CONSENT CALENDAR**

District Rule: 1196

Date: September 17, 2026
Time: 9:30 a.m.
Dept: Hearing Board South Coast Air
Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

DECLARATION OF CHRIS FIKE

I, Chris Fike, declare:

1. I am the Director of Maintenance Operations for Respondent Western Municipal Water District (“Western” or “Respondent”). I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could competently testify to all matters set forth herein.

2. I am familiar with the Stipulated Order for Abatement originally issued on September 12, 2023, which was subsequently modified after a hearing was held on September 12, 2024 (collectively and as modified, “Order”), and Respondent’s obligations under the Order.

3. I, following receipt of funding approval from Western’s Board of Directors and in concert with Western’s General Manager, personally oversee Respondent’s purchase of vehicles and prepared Respondent’s annual reports regarding Respondent’s compliance with the Order, which was submitted to South Coast Air Quality Management District (“South Coast AQMD”) pursuant to the Order, Condition 4.

4. Attached as **Exhibit 1** is a true and correct copy of the annual report, dated July 10, 2026, I prepared with the assistance of other staff at Western.

5. Respondent has taken several steps to comply with the Order. Specifically, Respondent has completed purchase of four (4) zero-emission vehicles (“ZEVs”) pursuant to the Order, Condition 1(a) and Attachment A. These purchases further ensure Respondent’s compliance with Condition 2 of the Order, which established a minimum of three ZEVs for replacement. Respondent notified the South Coast AQMD of these purchases pursuant to the Order, Condition 5.

6. Respondent is on track to completing the compliance schedule.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 14th day of September, at Riverside, California.


Chris Fike

EXHIBIT 1



Western Municipal Water District
14205 Meridian Parkway
Riverside, CA 92518
District Business | 951.571.7100
Customer Service | 951.571.7104

Craig D. Miller
General Manager

Mike Gardner
Division 1

Gracie Torres
Division 2

Brenda Dennstedt
Division 3

Laura Roughton
Division 4

Fauzia Rizvi
Division 5

July 10, 2026

VIA EMAIL

Dylan Plautz
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Subject: In re Matter of South Coast Air Quality Management District v. Western Municipal Water District, Case No. 6240-1, Annual Progress Report

Dear Mr. Plautz:

Pursuant to the Findings and Decision for a [Modified] Order of Abatement ("Order"), dated October 3, 2024, in the above captioned matter, Western Municipal Water District ("Western") hereby submit this annual progress report.

Status of Heavy- Duty Vehicle Replacement

In accordance with the Replacement Vehicle Schedule set forth in Attachment A of the Order (**Attachment 1**), Western completed the purchase of three zero-emission vehicles ("ZEVs") in December 2023 and one ZEV in June 2025, as shown in Table 1 below. Western notified South Coast Air Quality Management District ("SCAQMD") of the purchase of these vehicles on December 8, 2023 and June 30, 2025, respectively. Furthermore, on May 1, 2026, Western submitted a



Notification of Alternative Fuel Vehicle Purchase to SCAQMD for the replacement of Dump Truck, Unit 350, due to the inability to purchase a functionally equivalent ZEV. Pursuant to the Order, Western notified SCAQMD at least 60-days prior to the purchase of a Rule 1196-gasoline compliant replacement vehicle for Unit 350, and intends to purchase the gasoline-powered truck on or after July 1, 2026.

Table 1. Vehicles to Be Replaced by ZEVs

Unit ID	Vehicle Model	Committed Purchase Order Date in Order	Purchase Order Date
290	F550 Super Duty	FY2024, Q3	December 7, 2023
291	F550 Super Duty	FY2025, Q1	December 7, 2023
354	F550	FY2024, Q3	December 7, 2023
353	F550	FY2026, Q1	June 30, 2025
350	1148D	FY2027, Q1	TBD

In addition to the four ZEV purchases, Capital Improvement Program (CIP) funding has been established to replace the remaining heavy-duty vehicle, Unit 359, which is scheduled to occur as specified in Attachment A of the Order.

Status of Purchased ZEVs

On June 1, 2026, Western notified SCAQMD that it had received new ZEV Unit 387 on May 8, 2026, that was to replace diesel service truck Unit 353. Unit 353 was retired on June 5, 2026.



As discussed in last year's annual report, Western was still waiting to receive the three ZEVs purchased in December 2023, and had anticipated delivery by the end of 2025. To-date Western has yet to receive the three paid-in-full ZEVs, and has no current estimated delivery date from the vendor, Phoenix Motorcars. Western has serious concerns about Phoenix Motorcars' ability to deliver the three ZEVs. Western has made multiple attempts to contact Phoenix Motorcars, and they have, as of recently, become unresponsive. Western is weighing its options with respect to Phoenix Motorcars.

In the event that Phoenix Motorcars is unwilling to fulfill its obligations to deliver the three ZEVs to Western, Western is exploring the option of invoking Paragraph 2 of the Order by replacing Unit 290, 291 and 354 with ZEVs that are not equivalent in size. Western will be making a request to meet with SCAQMD staff to discuss our challenges with Phoenix Motorcars, and the various potential pathways to continue to comply with the Order.

Zero-Emission Infrastructure Installation

In 2023, Western purchased nine electric vehicle charging stations to support the use of ZEVs acquired pursuant to the Order. Over the past year, the Southern California Edison (SCE) Charge Ready Program project encountered setbacks due to easement-related complications. Those issues have now been addressed, and the project is back on track. Western anticipates construction of the charging stations will begin in Fall 2026 to support the delivery and use of the newly acquired ZEVs .

In addition to the nine charging stations, Western purchased three additional electric vehicle charging stations. Due to the continued delays of the SCE



Charge Ready Program project, Western decided to proactively install the three electric vehicle charging stations so that we now have ZEV charging capabilities.

If you have any questions or require further information, feel free to contact me at (951) 571-7288 or llewis@wmwd.com.

Sincerely,



Lyndy Lewis
Environmental and Regulatory Compliance Manager

Attachment:

1. Attachment 1 – Replacement Vehicle Schedule

CC: Eugene Kang, South Coast AQMD
Tim Barr, Deputy General Manager, Western Water
Paul Rugge, Executive Director of Operations, Western Water
Chris Fike, Director Maintenance Operations, Western Water
Dean Standing Warrior, Deputy Director Maintenance Operations, Western Water
Jennifer McMullin, Senior Management Analyst, Western Water
Wendy Wang, Best Best & Krieger
Digital File



Attachment A – Replacement Vehicle Schedule

Unit ID	License Plate No.	VIN	Model Year	Vehicle Model	Vehicle Type	Average Annual Mileage	Replacement Fuel Type	Purchase Order Date	Estimated Delivery Date
290	1369533	1FD0X5HT5BEA47548	2011	F550 Super Duty	Service Truck	3,290	ZEV	FY2024, Q3	FY2026, Q1
291	1369967	1FD0X5GT5BEC02505	2011	F550 Super Duty	Service Truck	7,640	ZEV	FY2025, Q1	FY2026, Q3
350	1463289	1FVHG3DV9FHGP7328	2015	1148D	Dump Truck	2,888	ZEV	FY2027, Q1	FY2028, Q3
353	1516381	1FDUF5GT1GEC85684	2016	F550	Service Truck	6,566	ZEV	FY2026, Q1	FY2027, Q3
354	1524595	1FDUF5GT3GEC85685	2016	F550	Service Truck	2,249	ZEV	FY2024, Q3	FY2026, Q1
359	1535350	1FDXF7DC8HDB10630	2017	F750	Crane Truck	2,708	ZEV	FY2028, Q1	FY2029, Q3
364	1557343	5KKHAXDV3KPKF1033	2019	Gap Vax	Hydro Vac	13,761	N/A	N/A	N/A
366	1402698	5KKHAVDV1MPML9433	2020	4700SF	Hydro Vac	3,048	N/A	N/A	N/A