San Elijo Joint Powers Authority (Michael Thornton)

See attached comment letter about clean fleet and emergency vehicle regulations.

SAN ELIJO | JOINT POWERS AUTHORITY

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April 9, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets – 15-Day Comment Period Response

Chair Lauren Sanchez and Members of the California Air Resources Board:

The San Elijo Joint Powers Authority (SEJPA) appreciates the opportunity to comment on the proposed amendments to the Advanced Clean Fleets regulation. SEJPA supports the State's climate and air quality goals and has made meaningful investments in sustainability and resource recovery. However, we respectfully request that CARB expand exemptions for specialized wastewater utility and emergency response support vehicles to ensure continued protection of public health, environmental quality, and essential services.

SEJPA is a regional wastewater agency serving the communities of Encinitas, Solana Beach, and Del Mar, as well as portions of Rancho Santa Fe. The Agency operates the San Elijo Water Campus, which produces more than 500 million gallons of recycled water annually and generates approximately 25 percent of its electrical demand through on-site solar production. Our operations are critical to maintaining water quality, environmental compliance, and system reliability across the region.

During emergency conditions, including power outages, storm events, and system failures, SEJPA relies on specialized vehicles and equipment to maintain continuous wastewater treatment and recycled water production. These vehicles support essential functions such as responding to sewer system blockages and overflows, operating and maintaining pump stations and treatment facilities, transporting equipment and fuel during power outages, and supporting extended operations under adverse conditions.

Many critical service vehicles in the water and wastewater industry, including combination vacuum/jetter trucks and other heavy-duty utility vehicles, currently have no viable zero-emission alternatives capable of meeting operational demands. Where alternatives are emerging, they are limited by range, charging availability, payload constraints, and the ability to operate continuously during emergency conditions, particularly when grid power is unavailable.

The proposed limitations on exemptions create a significant risk to system reliability and emergency response capability. Wastewater agencies must be able to respond immediately and operate continuously to prevent sewer spills, protect receiving waters, and maintain compliance with regulatory permits. Constraints on the availability or readiness of critical support vehicles could result in environmental damage, public health risks, and service disruptions.

SEJPA is committed to sustainability and has demonstrated leadership in reducing its environmental footprint through renewable energy, water recycling, and efficient operations. However, these efforts must be balanced with the fundamental responsibility to protect public health and the environment through reliable service delivery.

Accordingly, SEJPA respectfully requests that CARB:

- Expand exemptions to include specialized wastewater utility vehicles and emergency support vehicles
- Remove or increase caps that limit the number of exempt vehicles
- Allow flexibility for agencies to deploy low-emission or low-NOx internal combustion technologies where zero-emission alternatives are not yet feasible
- Recognize the operational realities of emergency response, including extended duration events and power outages

These modifications are necessary to ensure that wastewater agencies can continue to fulfill their critical role in protecting public health, maintaining environmental compliance, and supporting community resilience.

Thank you for your consideration of these comments.

Respectfully submitted,

Michael T. Thornton, P.E.
General Manager
San Elijo Joint Powers Authority