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Ref: 26 9527

April 8, 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:

Leucadia Wastewater District appreciates the opportunity to comment on the 15-day draft amendments to the Advanced Clean Fleets regulation. While we support the State's air quality and climate goals, wastewater emergency vehicles should be categorically exempted so local agencies can continue to protect public health, prevent sewer spills, and respond rapidly during emergencies.

Leucadia Wastewater District is a public wastewater agency serving approximately 62,000 residents across roughly 16 square miles in northern Encinitas and the La Costa area of Carlsbad. Our crews maintain about 200 miles of gravity sewer and multiple pump stations. During emergencies and other urgent public health situations, wastewater agencies rely on specialized utility vehicles and support vehicles used to respond to, inspect, diagnose, repair, and restore critical sewer infrastructure, prevent and mitigate sewer spills, support bypass and pump station operations, and operate for extended periods in adverse weather and other demanding field conditions.

If these specialized vehicles are not available when needed, the result can be sewer spills, environmental damage, service disruptions, roadway hazards, and increased risk to public health and water quality. These vehicles are critical tools used to maintain essential public sanitation services and continuity of wastewater operations.

Accordingly, we respectfully urge CARB to amend the Advanced Clean Fleets regulation to exempt specialized wastewater utility vehicles and support vehicles necessary to respond to, inspect, diagnose, repair, and restore critical sewer infrastructure during emergencies, system failures, spill events, and other urgent situations affecting public health, water quality, and continuity of service. CARB should adopt a clear exemption so wastewater agencies can continue serving their communities when needed most.

Please do not hesitate to contact me at (760) 753-0155 ext. 3014 or at pbushee@lwwd.org if you have any questions.

Thank you for your consideration,

Best regards,



Paul J. Bushee
General Manager