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Ref: 26-9592

June 9, 2026

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

Subject: Advanced Clean Fleets 2nd 15-Day Comment Period Response

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

We greatly appreciate the time and effort that has gone into the second 15-day comment period draft of the Advanced Clean Fleets (ACF) regulation published June 1, 2026 for public comment. While the goals of these regulations are laudable, the reality remains that Leucadia Wastewater District cannot safely and reliably serve its community unless specialized wastewater utility vehicles and support vehicles used for emergency response are excluded from the regulation.

Leucadia Wastewater District provides wastewater collection and related public health protection services for approximately 62,000 residents across about 16 square miles in northern San Diego County. The District operates and maintains roughly 200 miles of gravity sewer, 10 pump stations, approximately 16 miles of force mains, and about 5,000 manholes. During emergencies and urgent field conditions, our crews depend on specialized wastewater utility vehicles and support vehicles to respond to blockages, sewer spills, pump station failures, line breaks, storm-related system impacts, and other conditions that can threaten public health, water quality, and continuity of essential service.

To prevent unnecessary risks to public health, water quality, and property in the communities we serve, please reconsider the amendments respectfully requested in the April 14 letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing our state's 5,000 local agencies and 40 million residents.

Local agencies like ours continue to do our part in achieving the State's climate and emissions goals. However, the current ACF regulation and draft amendments still create unnecessary and impractical compliance challenges for agencies that must maintain readiness to respond immediately to wastewater emergencies and urgent infrastructure failures. This concern is heightened by CARB's latest proposed clarifications expanding the rule to vehicles operated by or for local agencies, including vehicles that are leased, rented, or contracted for operation. For wastewater agencies, emergency response often depends on specialized vehicles and support vehicles that must be available without delay, regardless of whether they are owned directly or used through contractual arrangements.

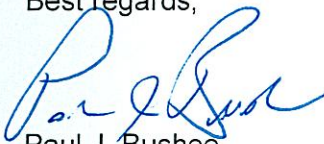
The exemptions in the current regulation and draft amendments remain insufficient because they do not clearly and categorically protect specialized wastewater utility vehicles and support vehicles necessary to respond to, inspect, diagnose, repair, and restore critical sewer infrastructure during emergencies and other urgent public health situations.

Specialized wastewater emergency vehicles may need to operate continuously for several days during storms, outages, and other emergency conditions. Reliable zero-emission vehicles with the necessary size, power, range, and specialized equipment capabilities are either not currently available or not yet proven for this type of mission-critical use. In addition, long charging times and the possibility of extended power outages could significantly hinder emergency response and restoration of service when these vehicles are needed most.

In the same manner as the vehicle categories currently identified in part (c) of section 2013 of title 13 of the California Code of Regulations, we respectfully request a categorical exclusion for specialized wastewater utility vehicles and support vehicles, and similarly situated public utility and emergency-support vehicles, that respond to, assist in, prevent, mitigate, and recover from disasters, emergencies, and urgent threats to public health and safety. For wastewater agencies, this should include vehicles necessary to respond to, inspect, diagnose, repair, and restore critical sewer infrastructure and to prevent or mitigate sewer spills, blockages, pump station failures, collapses, and storm-related system impacts.

Thank you for your consideration.

Best regards,



Paul J. Bushee
General Manager