



# De Luz

## Community Services

### District

#### Board Of Directors

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Robert D'Alessandri  
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#### General Manager

James E. Emmons

April 13th, 2026

#### Clerk's Office

California Air Resources Board  
1001 I Street, Sacramento, CA 95814

RE: Advanced Clean Fleets Regulation Amendments/15 Day Changes

Dear California Air Resources Board:

The De Luz Community Services District (DLCSD) is located in the mountains west of the City of Temecula and east of Camp Pendleton. The entire district is agricultural/residential and encompasses 86 miles of public road. There are no commercial services of any kind within the district, and the mountain peaks range from 1,500' to 4,000' above sea level. The nearest EV charging station is 5-15 miles from any location in the District. The primary mission of DLCSD is road maintenance, which it does with a staff of 5, and 7 vehicles. We do not anticipate purchasing a medium or heavy-duty vehicle prior to 2030. We appreciate the improved guidance for using the Daily Usage Exemption, but we wish to point out how the methodologies unfairly discriminate against DLCSD due to its small size, how infrequently it purchases new vehicles, and the extreme conditions our staff sometimes must endure during a winter storm. Here are our specific concerns:

- DLCSD is unfairly precluded from applying for a Daily Usage Exemption.

To date, DLCSD has not added to its fleet since the Advanced Clean Fleets (ACF) regulations came into effect. For this reason, DLCSD currently owns no Zero Emission Vehicles (ZEVs). This alone disqualifies it from applying for a Daily Usage Exemptions since Sec. 2013(b)(1) requires that 10% of the existing fleet be ZEVs to be eligible to apply under any of the methodologies. DLCSD is precluded from applying for the exemption for no other reason than an accident of history. If events had conspired to cause DLCSD to buy a ZEV at some point in the past, it would be in a position to apply for the exemption, but the need is the same regardless of what did or did not happen in the past. For entities as small, but not smaller than DLCSD, the 10% ZEV fleet requirement is an arbitrary and unfair barrier. DLCSD is being discriminated against despite doing nothing wrong.

- Even if DLCSD could apply for the Real-World Test Data Collection methodology (Sec. 2013.2(b)(4)(C)), the required data would paint a false picture of what DLCSD needs from a ZEV.

***Under (C)1, DLCSD would have to report the "average ambient daily temperature ....." This disadvantages DLCSD due to its elevation and temperature extremes unless it can somehow contrive to gather the requested data only during severe winter storms. Any vehicle purchased by DLCSD must be able to carry out all duties under the worst conditions. Since ZEVs are known to lose power in cold conditions, only data relevant to cold weather performance matters.***

***While DLCSD assumes the Real-World Test Data Collection path is best suited to our needs, this concern applies equally to the other two pathways as well. For example, calculating "equivalent battery capacity" under the Total Energy Usage Methodology does not even consider cold weather performance, yet the ICE fuel consumption will be the same in both cold and mild conditions. Once an ICE reaches operating temperature, its range and performance are unaffected by cold conditions. Not so for the ZEV. Therefore, all of the methodologies need to accurately factor in cold weather performance of the ZEV to allow for a fair comparison.***

For the above reasons, DLCSD requests the following:

- 1. Delete the 10% ZEV fleet requirement from Sec. 2013(b)(1).** This requirement is arbitrary and says nothing about the legitimacy of a request for an exemption.
- 2. Amend all the methodologies to allow for accurate conversion to cold weather performance of the ZEV under consideration.**

DLCSD very much appreciates the work that CARB has put into these regulations, and for listening to the concerns of the public agencies affected by the program.

Sincerely,



James Emmons  
General Manager/De Luz Community Services District  
41606 Date St. Suite 205  
Murrieta, CA 92563  
(951)696-0060