



De Luz

Community Services

District

Board Of Directors

Charles Bowman
Paula Carroll
Robert D'Alessandri
Gina Rawson
Debbie Roberts

General Manager

James E. Emmons

June 16th, 2026

Clerk's Office
California Air Resources Board
1001 I Street, Sacramento, CA 95814

RE: Advanced Clean Fleets /15 Day Comment related to Rented and Leased Vehicles

Dear California Air Resources Board:

The De Luz Community Services District (DLCSD) is located in the mountains west of the City of Temecula. The entire district is residential and encompasses 83 miles of road. There are no services of any kind within the district, and the mountain peaks range from 1,500' to 3,000' above sea level. The primary mission of DLCSD is road maintenance, which it does with a staff of 5, and 7 vehicles. We have not purchased a new medium or heavy-duty vehicle since the adoption of the Advanced Clean Fleets (ACF) regulations and hope to avoid purchasing one before 2030.

DLCSD submitted prior comments explaining how the Daily Usage Exemptions under Sec. 2013(b)(1), which requires that 10% of the existing fleet be zero emission vehicles (ZEVs) to be eligible to apply under any of the methodologies, unfairly precludes DLCSD from applying for the exemption for no other reason than an accident of history. Our comments also expressed why we have doubts that any available ZEV can reliably operate in our service district, but we are willing to explore the possibility by renting a ZEV truck for a trial period to determine feasibility.

In light of this opportunity to comment on the proposed changes related to rented and leased ZEVs, we wish to restate our previous comments in this context. The day will come when DLCSD will need a new vehicle covered by the ACF regulations, and the concerns we raised apply equally to leased or purchased vehicles. DLCSD should not be precluded from applying for an exemption available to similarly situated special districts for no other reason than we never had the need or opportunity to purchase a ZEV in the past.

For the above reasons, DLCSD renews its request for a waiver of the 10% ZEV requirement under Sec. 2013 for small fleets where the regulated agency can demonstrate that it has neither purchased, rented, or leased, a covered vehicle since the adoption of the ACF regulations.

Sincerely,

James E. Emmons
General Manager, De Luz Community Service District