

El Camino Irrigation District

Comment Letter

4/16/2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Opposition to Zero-Emission Mandate as Applied to Small Rural Special Districts

To Whom It May Concern:

El Camino Irrigation District submits this letter in opposition to the proposed zero-emission mandate to the extent it applies, directly or indirectly, to small rural special districts such as ours.

El Camino Irrigation District is a small special district with very limited funding whose primary responsibility is to provide water service to irrigators. Our district operates with constrained financial resources and a narrow operational focus centered on delivering essential agricultural water supplies. Unlike larger agencies with broader revenue sources, we do not have the financial flexibility to absorb significant new capital costs, fleet replacement expenses, facility upgrades, or infrastructure investments associated with a zero-emission mandate. Further complicating the effort, our ability to raise prices for both water delivery and our capital improvement assessment are constrained by Prop 218, with any increases requiring a vote of the irrigators. Our two efforts to raise the capital improvement assessment, attempted over the last 14 years (at a cost to the District of \$50,000) have both failed, and in consequence, our capital improvement assessments remain frozen at 1992 levels with no options.

The District receives \$110,000 annually for capital improvements for our 7500 acres groundwater District, and this has remained stagnant since 1992 and will continue at this level. These dollars must be directed solely toward its core mission and urgent infrastructure needs. El Camino Irrigation District is responsible for maintaining and replacing aging water delivery infrastructure, including 91 miles of buried 100+ year-old cement pipe that is deteriorating and leaky, and 38 wells, the last of these having been drilled in 1972. These are not optional improvements. They are essential obligations of the District to its constituents and to the continued delivery of reliable irrigation water. Every available dollar must go toward repairing and replacing this failing infrastructure and meeting the District's service responsibilities. We simply do not have the financial resources to purchase new trucks or take on additional costs associated with a zero-emission vehicle transition.

While we understand and respect the State's broader goals of reducing emissions and improving air quality, the proposed mandate does not adequately account for the realities facing small rural districts that provide basic services with minimal budgets. For El Camino Irrigation District,

requiring the transition to zero-emission vehicles or equipment, whether directly or indirectly, would place an added burden on a district that is already struggling to address longstanding infrastructure needs with woefully underfunded resources.

We are also concerned about the indirect effects of the mandate. Even if a small special district is not immediately or explicitly covered, compliance expectations may still arise through contracting requirements, grant conditions, procurement standards, or partnerships with local or state agencies. For a district with limited staffing and funding, this kind of uncertainty creates serious concern. It may also make it harder for small districts to participate in cooperative efforts or remain competitive for funding opportunities.

Rural districts face additional practical challenges that differ significantly from those in urban settings. Our operations often require travel over long distances, our work is performed in very rural areas, and use equipment that must remain dependable and functional in harsh field conditions. The current availability, cost, and infrastructure limitations associated with zero-emission technology do not reflect the practical needs of small agricultural water districts.

For these reasons, El Camino Irrigation District respectfully opposes the mandate unless and until CARB provides clear exemptions, realistic flexibility, and explicit protections for small rural special districts with limited funding and essential public service responsibilities.

At a minimum, we urge CARB to:

1. Exempt small rural special districts whose limited budgets and operational demands make compliance impracticable.
2. Clarify that indirect compliance obligations will not be imposed through grants, contracts, procurement standards, or agency partnerships.
3. Recognize the disproportionate effect of these requirements on small districts that exist solely to provide basic services such as irrigation water delivery.
4. Provide meaningful flexibility and funding support before considering any future application of such requirements to small rural public agencies.

Thank you for the opportunity to comment and for considering the needs of small rural special districts and the agricultural communities they serve.

Sincerely,



Kristin Lamkin

Board Chair

El Camino Irrigation District

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