



4/16/26

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Re: Comment on Zero-Emission Mandate and Impacts on Nonprofits and Conservation Partnerships

To Whom It May Concern:

The Tehama Conservation Fund appreciates the opportunity to comment on the proposed zero-emission vehicle mandate and related implementation requirements. We support California's long-term goals to reduce emissions and improve air quality. However, we respectfully submit the following concerns regarding how these requirements may affect nonprofit organizations and conservation-focused entities working in partnership with state and local agencies.

At present, nonprofit organizations may not be directly subject to the mandate. Even so, the practical effects of the regulation may still significantly impact nonprofits that operate in the conservation space, especially those that depend on partnerships with local and state agencies to carry out grant-funded work. Many conservation nonprofits work closely with public agencies on project delivery, equipment sharing, contracting, field coordination, and implementation of land stewardship, habitat restoration, wildfire resilience, and watershed improvement projects. If agency partners are required to transition fleets, equipment, or operations under the mandate, those changes may indirectly shape procurement requirements, partnership terms, and project eligibility in ways that burden nonprofit collaborators.

We are particularly concerned about the effect this could have on agencies that rely almost entirely on grant funding to operate. Agencies or districts that are heavily grant-dependent may face substantial new capital and operational costs associated with compliance, including vehicle replacement, charging infrastructure, specialized equipment conversion, and ongoing maintenance or reliability issues in rural conditions. These added costs may reduce their competitiveness for grants and project awards when compared with nonprofit organizations that are not yet directly subject to the same requirements. This creates an uneven landscape within the



conservation sector, where similarly situated entities may be treated differently despite serving the same public benefit goals and often competing for the same funding opportunities.

We are also concerned that organizations partnering with local or state government agencies may be drawn into compliance obligations, either formally or informally, simply because of the nature of those partnerships. If a nonprofit is implementing work under contract with, in support of, or alongside a public agency, there is uncertainty about whether that relationship could trigger expectations or requirements to follow the same zero-emission standards. This ambiguity could discourage collaboration, complicate project design, and make it more difficult for small rural organizations to participate in public-benefit conservation work.

These concerns are especially significant in rural areas, where conservation work frequently requires long travel distances, operation on unimproved roads, hauling equipment, and work in remote locations without reliable charging infrastructure. A one-size-fits-all approach may unintentionally disadvantage the very agencies and nonprofit partners that are delivering critical environmental services in some of California's most fire-prone and infrastructure-limited regions.

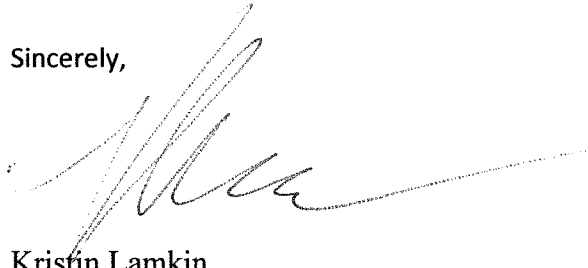
For these reasons, we respectfully request that CARB:

1. Clarify whether and under what circumstances nonprofit organizations partnering with local or state agencies may become subject to zero-emission requirements, whether directly, indirectly, or through procurement or contract conditions.
2. Consider the competitive impacts on agencies and special districts that rely primarily or entirely on grant funding and may be placed at a disadvantage relative to nonprofits not yet covered by the mandate.
3. Provide clear exemptions, flexibility measures, or phased implementation pathways for rural, grant-dependent, and field-based entities whose work depends on heavy-duty use, long travel distances, and limited infrastructure.
4. Ensure that conservation partnerships are not unintentionally disrupted by regulatory uncertainty or compliance expectations that extend beyond the entities clearly covered by the rule.

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We appreciate CARB's consideration of these issues. California's emission-reduction goals are important, but implementation should account for the realities of rural operations, grant-funded public service, and the collaborative structure of conservation work across agencies and nonprofit organizations.

Sincerely,



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CFO/Controller

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