

Tehama Conservation Fund & El Camino Irrigation District  
(Kristen Lamkin)

# 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

8451 Hwy 99W, Gerber, CA 96035

530-514-3627



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.

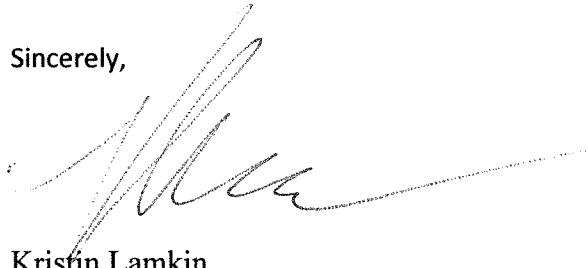
For these reasons, we respectfully request that CARB:

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.

**TCF**  
TEHAMA  
CONSERVATION FUND

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,



Kristin Lamkin

CFO/Controller

Tehama Conservation Fund

PO Box 1232

Red Bluff, CA 96080

530-514-3627

