



**1107 Ninth Street, Suite 1005
Sacramento, CA 95814
(916) 441-5700 (916) 441-5708 FAX
www.capcoa.org**

April 4, 2017

PRESIDENT

W. James Wagoner
Butte County AQMD

VICE PRESIDENT

Michael Villegas
Ventura County APCD

**SECRETARY/CHIEF
FINANCIAL OFFICER**

Erik C. White
Placer County APCD

PAST PRESIDENT

Richard A. Stedman
Monterey Bay ARD

DIRECTORS

Larry Allen
San Luis Obispo County APCD

Jack P. Broadbent
Bay Area AQMD

Christopher D. Brown
Feather River AQMD

Mat Ehrhardt
Yolo-Solano AQMD

Doug Gearhart
Lake County AQMD

Larry F. Greene
Sacramento Metro AQMD

Dave Johnston
El Dorado County AQMD

Robert Kard
San Diego County APCD

Wayne Natri
South Coast AQMD

Seyed Sadredin
San Joaquin Valley APCD

EXECUTIVE DIRECTOR

Alan Abbs
alan@capcoa.org

Floor Alert – Truck Exemption

The California Air Pollution Control Officers Association (CAPCOA), representing the air pollution control officers from the 35 local air pollution control districts and air quality management districts in California, is pleased that SB 1 includes significant funding for transit and Active Transportation. **However, we have significant concerns with the proposed exemption for the trucking industry contained in Section 18 of the bill as amended on April 3, 2017.** We urge you to further amend the bill to reinstate Air Resources Board (ARB) and air district authority to fully implement air quality management plans for ozone and fine particulates, as well as the resulting toxic air contaminants.

Section 18 of SB 1, even after amendments made on April 3, 2017 weakens ARB and air district authority and would:

- (1) Impede or preclude an air district's ability to adopt indirect source rules that may affect trucks, such as at ports, warehouses, railyards and airports, and
- (2) Limit ARB and air district authority to require retrofit control technology regardless of local benefits to public health or even in the case of affordable technological breakthroughs, and
- (3) Prevent the South Coast Air Quality Management District from adopting fleet rules that would clean up state and local government fleets to zero and near zero emission levels as quickly as feasible.

State law already imposes numerous requirements to ensure that air districts actively consider and minimize the socioeconomic impact of rules that it adopts, along with considering their cost-effectiveness, as well as any potential conflict with other regulatory requirements. Moreover, exempting trucks from additional feasible emission reductions is unfair because it ultimately means other sources must contribute additional emission reductions. Mobile sources make up the majority of oxides of nitrogen emissions in California, and must be reduced substantially to meet ozone and particulate standards in many parts of the state. In order for our residents to breathe clean air, all sources must contribute all feasible reductions.

We strongly urge you to delete the trucking exemption, or to further amend Section 18 to make clear that the language does not, in any way, restrict ARB or air district authority.

CAPCOA supports adoption of a transportation funding bill that is fair to all, and recognizes the need for transportation sources, especially in the goods movement industry, to contribute to funding programs to mitigate the adverse air pollution impacts of our growing transportation sources. We greatly appreciate your efforts to help California meet its public health goals and we look forward to working with you on this important measure.